

THIS OBJECTION SEEKS TO DISALLOW, EXPUNGE, MODIFY, REDUCE, AND/OR RECLASSIFY CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS NOTICE OF THE DEBTORS' SEVENTEENTH OMNIBUS CLAIMS OBJECTION TO PROOFS OF CLAIM SHOULD REVIEW THE OMNIBUS OBJECTION TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION AND/OR THE EXHIBITS AND SCHEDULES ATTACHED THERETO TO DETERMINE WHETHER THIS OBJECTION AFFECTS THEIR CLAIM(S).

IF YOU HAVE QUESTIONS, PLEASE CONTACT GRUPO AEROMÉXICO'S COUNSEL, DAVIS POLK & WARDWELL LLP, AT aeromexicoclaims@dpw.com, RICHARD J. STEINBERG (richard.steinberg@davispolk.com or +1-646-460-1954), OR MOSHE MELCER (+1-732-606-3155).

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**GRUPO AEROMÉXICO, S.A.B. de C.V., et al.,
Debtors.¹**

Chapter 11

Case No. 20-11563 (SCC)

(Jointly Administered)

**NOTICE OF HEARING ON DEBTORS' SEVENTEENTH OMNIBUS CLAIMS
OBJECTION TO PROOFS OF CLAIM (MISCLASSIFIED UNLIQUIDATED, WRONG
DEBTOR, INCORRECTLY CLASSIFIED, NO LIABILITY, SATISFIED, AMENDED,
DUPLICATE, REDUCED, AND/OR FOREIGN CURRENCY CLAIMS)**

PLEASE TAKE NOTICE that, on August 18, 2021, Grupo Aeroméxico, S.A.B. de C.V. (“**Grupo Aeroméxico**”) and its affiliates that are debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”) filed their *Seventeenth Omnibus Claims Objection to Proofs of Claim (Misclassified Unliquidated, Wrong Debtor, Incorrectly Classified, No Liability, Satisfied, Amended, Duplicate, Reduced, and Foreign Currency Claims)* (the “**Objection**”) with the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”).

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Grupo Aeroméxico, S.A.B. de C.V. 286676; Aerovías de México, S.A. de C.V. 108984; Aerolitoral, S.A. de C.V. 217315; and Aerovías Empresa de Cargo, S.A. de C.V. 437094-1. The Debtors' corporate headquarters is located at Paseo de la Reforma No. 243, piso 25 Colonia Cuauhtémoc, Mexico City, C.P. 06500.

The Objection is annexed hereto as **Exhibit A**. The Objection requests that the Bankruptcy Court disallow, expunge, modify, reduce, and/or reclassify one or more of your Claims² listed on the schedules (collectively, the “**Schedules**”) attached to **Exhibit 1** of the Objection on the grounds that such Claims:

- (i) incorrectly state that all or a portion of the Claim is unliquidated (“**Misclassified Unliquidated Claims**”);
- (ii) have been filed against the wrong Debtor (“**Wrong Debtor Claims**”);
- (iii) in part or in full, are not entitled to the asserted status or other priority (“**Incorrectly Classified Claims**”);
- (iv) seek to recover amounts for which the Debtors are not liable (“**No Liability Claims**”);
- (v) (a) have been paid or otherwise satisfied by the Debtors after the Petition Date in accordance with the Bankruptcy Code, applicable rules, or an order issued by the Bankruptcy Court or (b) have been satisfied in full by a party that is not a Debtor (collectively, “**Satisfied Claims**”);
- (vi) have been amended or superseded by other Claims (“**Amended Claims**”);
- (vii) are duplicative of other Claims (“**Duplicate Claims**”);
- (viii) seek to recover amounts in excess of the accurate Claim amount (“**Reduced Claims**”); and/or
- (ix) were asserted in a currency other than United States dollars or Mexican pesos (“**Foreign Currency Claims**”).

Any Claim that the Bankruptcy Court expunges and disallows will be treated as if it had not been filed and you will not be entitled to any distribution on account thereof. Any Claim that the Bankruptcy Court modifies, reduces, and/or reclassifies will remain on the Claims Register as modified, reduced, and/or reclassified.

² Each capitalized term used herein but not otherwise defined herein shall have the meaning ascribed to it in the Objection.

PLEASE TAKE FURTHER NOTICE that the *Court-Ordered Omnibus Claims Hearing Procedures* [ECF No. 904] (the “**Omnibus Claims Hearing Procedures**”), annexed hereto as **Exhibit B**, apply and govern the Objection to your Proof(s) of Claim. The Omnibus Claims Hearing Procedures provide for certain mandatory actions by a claimant within certain time periods. Therefore, please review the Omnibus Claims Hearing Procedures carefully. Failure to comply with the Omnibus Claims Hearing Procedures may result in the disallowance, expungement, modification, reduction and/or reclassification of a Proof of Claim without further notice to a claimant.

If you do NOT oppose the disallowance, expungement, modification, and/or reclassification of your Claim(s) listed on the Schedules attached to Exhibit 1 of the Objection, then you do NOT need to file a written response to the Objection and you do NOT need to appear at the Hearing (as defined below).

If you DO oppose the disallowance, expungement, modification, reduction and/or reclassification of your Claim(s) listed on the Schedules attached to Exhibit 1 of the Objection, then you MUST file with the Bankruptcy Court and serve on the parties listed below a written response to the Objection (a “**Response**”) so that it is received on or before **Friday, September 17, 2021 at 4:00 p.m. (prevailing Eastern Time)** (the “**Response Deadline**”).

Your Response, if any, must contain at a minimum the following: (i) a caption setting forth the name of the Bankruptcy Court, the names of the Debtors, the case number, and title of the Objection to which the response is directed; (ii) the name of the claimant and description of the basis for the amount of the Claim; (iii) a concise statement setting forth the reasons why the Claim should not be disallowed, expunged, modified, reduced and/or reclassified for the reasons set forth in the Objection, including, but not limited to, the specific factual and legal bases upon which you will rely

in opposing the Objection; (iv) all documentation or other evidence of the Claim, to the extent not included with the Proof of Claim previously filed with the Bankruptcy Court, upon which you will rely in opposing the Objection; (v) the address(es) to which the Debtors must return any reply to your Response, if different from that presented in the Proof of Claim; and (vi) the name, address, and telephone number of the person (which may be you or your legal representative) possessing ultimate authority to reconcile, settle, or otherwise resolve the Claim on your behalf.

The Bankruptcy Court will consider a Response only if the Response is timely filed, served, and received. A Response will be deemed timely filed, served, and received only if prior to the Response Deadline, the Response is (a) filed electronically with the Bankruptcy Court on the docket of *In re Grupo Aeroméxico, S.A.B. de C.V., et al.*, Case No. 20-11563 (SCC), in accordance with the Bankruptcy Court's General Order M-399 (available on the Bankruptcy Court's website at <http://www.nysb.uscourts.gov>), by registered users of the Bankruptcy Court's electronic case filing ("ECF") system, (b) sent to the chambers of the Honorable Judge Shelley C. Chapman, United States Bankruptcy Court, One Bowling Green, New York, New York 10004; and (c) served (via email or otherwise) so as to be actually received on or before the Response Deadline upon (i) Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, New York 10017 (Attn: Timothy Graulich (timothy.graulich@davispolk.com), Stephen D. Piraino (stephen.piraino@davispolk.com), Erik P. Jerrard (erik.jerrard@davispolk.com), and Richard J. Steinberg (richard.steinberg@davispolk.com)), counsel to the Debtors and (ii) Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, New York 10019 (Attn: Brett H. Miller (bmiller@willkie.com), Todd M. Goren (tgoren@willkie.com), Craig Damast (cdamast@willkie.com), and Debra M. Sinclair (dsinclair@willkie.com)), counsel to the Official Committee of Unsecured Creditors appointed in these cases.

Except as otherwise permitted under the Omnibus Claims Hearing Procedures, a hearing (the “Hearing”) will be held on **Monday, September 20, 2021 at 1:00 p.m. (prevailing Eastern Time)**, to consider the Objection. The Hearing will be held in the United States Bankruptcy Court for the Southern District of New York. If you file a written Response to the Objection, you should plan to appear at the Hearing. The Debtors, however, reserve the right to continue the Hearing on the Objection with respect to your Claim(s). If the Debtors do continue the Hearing with respect to your Claim(s), then the Hearing will be held at a later date. If the Debtors do not continue the Hearing with respect to your Claim(s), then the Hearing on the Objection will be conducted on the above date.

The Debtors have the right to object to your Claim(s) listed on the Schedules attached to Exhibit 1 of the Objection (or to any other Claims you may have filed) at a later date on grounds not asserted in the Objection unless the Bankruptcy Court disallows and expunges your Claim(s). You will receive a separate notice of any such objections.

Responding parties shall attend the Hearing telephonically so long as General Order M-543 is in effect or unless otherwise ordered by the Bankruptcy Court. You may participate in the Hearing telephonically by making arrangements through CourtSolutions, LLC (www.court-solutions.com). Instructions to register for CourtSolutions, LLC are attached to General Order M-543.³

If you wish to view the complete Objection, you can do so for free at <https://dm.epiq11.com/aeromexico>. **CLAIMANTS SHOULD NOT CONTACT THE CLERK OF THE BANKRUPTCY COURT TO DISCUSS THE MERITS OF THEIR CLAIMS.**

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³ A copy of General Order M-543 can be obtained by visiting <http://www.nysb.uscourts.gov/news/court-operations-under-exigent-circumstances-created-covid-19>.

Dated: August 18, 2021
New York, New York

DAVIS POLK & WARDWELL LLP

By: /s/ Timothy Graulich
450 Lexington Avenue
New York, New York 10017
Telephone: (212) 450-4000
Facsimile: (212) 701-5800
Marshall S. Huebner
Timothy Graulich
James I. McClammy
Stephen D. Piraino
Erik Jerrard (admitted *pro hac vice*)

*Counsel to the Debtors
and Debtors in Possession*

Exhibit A

Objection

DAVIS POLK & WARDWELL LLP
450 Lexington Avenue
New York, New York 10017
Telephone: (212) 450-4000
Facsimile: (212) 701-5800
Marshall S. Huebner
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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**GRUPO AEROMÉXICO, S.A.B. de C.V., et al.,

Debtors.¹**

Chapter 11

Case No. 20-11563 (SCC)

(Jointly Administered)

**DEBTORS' SEVENTEENTH OMNIBUS CLAIMS OBJECTION TO PROOFS OF
CLAIM (MISCLASSIFIED UNLIQUIDATED, WRONG DEBTOR, INCORRECTLY
CLASSIFIED, NO LIABILITY, SATISFIED, AMENDED, DUPLICATE,
REDUCED, AND/OR FOREIGN CURRENCY CLAIMS)**

* * *

**TO THE CLAIMANTS LISTED ON THE SCHEDULES ATTACHED TO THE PROPOSED ORDER
(ATTACHED HERETO AS EXHIBIT 1): YOUR RIGHTS MAY BE AFFECTED BY THIS
OBJECTION AND BY ANY FURTHER OBJECTION(S) THAT MAY BE FILED BY THE
DEBTORS. THE RELIEF SOUGHT HEREIN IS WITHOUT PREJUDICE TO THE DEBTORS'
RIGHTS TO PURSUE FURTHER SUBSTANTIVE OR NON-SUBSTANTIVE OBJECTIONS
AGAINST THE CLAIMS LISTED ON THE SCHEDULES ATTACHED TO THE PROPOSED
ORDER. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND
CLAIMS ON THE SCHEDULES ATTACHED TO THE PROPOSED ORDER.**

* * *

¹ The Debtors in these cases, along with each Debtor's registration number in the applicable jurisdiction, are as follows: Grupo Aeroméxico, S.A.B. de C.V. 286676; Aerovías de México, S.A. de C.V. 108984; Aerolitoral, S.A. de C.V. 217315; and Aerovías Empresa de Cargo, S.A. de C.V. 437094-1. The Debtors' corporate headquarters is located at Paseo de la Reforma No. 243, piso 25 Colonia Cuauhtémoc, Mexico City, C.P. 06500.

Grupo Aeroméxico S.A.B. de C.V. (“**Grupo Aeroméxico**”) and its affiliates that are debtors and debtors in possession in these proceedings (collectively, the “**Debtors**”) hereby file this *Seventeenth Omnibus Claims Objection to Proofs of Claim (Misclassified Unliquidated, Wrong Debtor, Incorrectly Classified, No Liability, Satisfied, Amended, Duplicate, Reduced, and/or Foreign Currency Claims)* (the “**Objection**”), pursuant to the *Order Approving (I) Omnibus Claims Objection Procedures, (II) Omnibus Claims Settlement Procedures and (III) Omnibus Claims Hearing Procedures* [ECF No. 904] (the “**Claims Objections Procedures Order**”). This Objection is supported by the *Declaration of Ricardo Javier Sánchez Baker in Support of the Seventeenth Omnibus Claims Objection to Proofs of Claim (Misclassified Unliquidated, Wrong Debtor, Incorrectly Classified, No Liability, Satisfied, Amended, Duplicate, Reduced, and/or Foreign Currency Claims)* (the “**Sánchez Declaration**”), attached hereto as **Exhibit 2** and incorporated herein by reference. In further support of the Objection, the Debtors respectfully state as follows:

Relief Requested

1. By this Objection, and pursuant to sections 105 and 502 of title 11 of the United States Code (the “**Bankruptcy Code**”), rule 3007 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and the Claims Objections Procedures Order, the Debtors seek entry of an order, substantially in the form attached hereto as **Exhibit 1** (the “**Proposed Order**” and, if entered, the “**Order**”), disallowing, expunging, modifying, reducing, and/or reclassifying each of the claims identified on the schedules attached to the Proposed Order (collectively, the “**Schedules**”), as set forth therein.²

² The Schedules are incorporated herein by reference.

Jurisdiction and Venue

2. The United States Bankruptcy Court for the Southern District of New York (the “**Court**”) has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference M-431*, dated January 31, 2012 (Preska, C.J.). This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and, pursuant to Bankruptcy Rule 7008, the Debtors consent to entry of a final order by the Court in connection with this Objection to the extent that it is later determined that the Court, absent consent of the parties, cannot enter a final order or judgment consistent with Article III of the United States Constitution.

3. The legal predicates for the relief requested herein are sections 105 and 502 of the Bankruptcy Code, and Bankruptcy Rule 3007.

4. Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

Background

A. General Background

5. On June 30, 2020 (the “**Petition Date**”), the Debtors each commenced in this Court a voluntary case (the “**Chapter 11 Cases**”) under chapter 11 of title 11 of the United States Code. The Debtors are authorized to continue to operate their businesses and manage their properties as debtors in possession pursuant to Bankruptcy Code §§ 1107(a) and 1108.

6. The Debtors’ Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b).

7. On July 13, 2020, the United States Trustee formed an Official Committee of Unsecured Creditors (the “**Creditors’ Committee**”) in the Chapter 11 Cases. No trustee or examiner has been appointed in the Chapter 11 Cases.

8. The Court entered a (i) *Final Order Authorizing (I) Debtors to Honor Prepetition Obligations to Customers and Related Third Parties and to Otherwise Continue Customer Programs, (II) Relief from Stay to Permit Setoff in Connection with the Customer Programs and (III) Financial Institutions to Honor and Process Related Checks and Transfers* [ECF No. 205] (the “**Customer Programs Order**”); (ii) *Final Order Authorizing (I) Debtors to Pay Certain Prepetition Taxes, Governmental Assessments and Fees and (II) Financial Institutions to Honor and Process Related Checks and Transfers* on July 29, 2020 [ECF No. 206] (the “**Taxes Order**”); (iii) *Final Order Authorizing (I) Debtors to (A) Pay Prepetition Wages, Salaries, Employee Benefits and Other Compensation and (B) Maintain Employee Benefits Programs and Pay Related Administrative Obligations, (II) Employees and Retirees to Proceed With Outstanding Workers’ Compensation Claims And (III) Financial Institutions to Honor and Process Related Checks and Transfers* on July 30, 2020 [ECF No. 216] (the “**Wages Order**”); and (iv) *Final Order Authorizing (I) Payment of Certain Prepetition Claims of Critical Vendors and Foreign Vendors and (II) Financial Institutions to Honor and Process Related Checks and Transfers* on August 20, 2020 [ECF No. 309] (the “**Critical Vendors Order**” and together with the Customer Programs Order, Taxes Order, and Wages Order, the “**First Day Orders**”).

9. Detailed information regarding the Debtors’ business, capital structure, and the circumstances leading to the commencement of these Chapter 11 Cases, is set forth in the *Declaration of Ricardo Javier Sánchez Baker in Support of the Debtors’ Chapter 11 Petitions and First Day Pleadings* [ECF No. 20], filed with the Court on the Petition Date.

B. Claims Resolution Process in the Chapter 11 Cases

10. On July 2, 2020, the Court entered an *Order Authorizing Debtors to Retain and Employ Epiq Corporate Restructuring, LLC as Claims and Noticing Agent Nunc Pro Tunc to the*

Petition Date [ECF No. 47], thereby appointing Epiq Corporate Restructuring, LLC (“**Epiq**”) as the Debtors’ claims and noticing agent in these Chapter 11 Cases.

11. On August 25, 2020, the Debtors filed their respective schedules of assets and liabilities [ECF Nos. 326, 328, 330, 332] and statements of financial affairs [ECF Nos. 327, 329, 331, 333] (collectively, the “**Chapter 11 Schedules**” and “**Statements**,” respectively). On August 28, 2020, the Debtors filed an amendment to the Statement filed by Debtor Aerovías de México, S.A. de C.V. [ECF No. 342]. The Debtors filed amendments to certain of the Debtors’ Chapter 11 Schedules on December 17, 2020 [ECF Nos. 737–40], as well as on January 15, 2021 [ECF Nos. 808–10].

12. On November 18, 2020, the Court entered an *Order (I) Establishing Deadline for Filing Proofs of Claim and Procedures Relating Thereto and (II) Approving the Form and Manner of Notice Thereof* [ECF No. 648] (the “**Bar Date Order**”) establishing January 15, 2021 at 5:00 p.m. (prevailing Pacific Time) as the General Bar Date (as defined in the Bar Date Order) (the “**Bar Date**”).

13. On December 11, 2020, Epiq duly served the *Notice of Deadline Requiring Filing of Proofs of Claim on or Before January 15, 2021* [ECF No. 778] (the “**Bar Date Notice**”). Between December 14, 2020 and December 16, 2020, the Debtors caused the Bar Date Notice to be published in the *New York Times International Edition*, the *New York Times*, and the *Wall Street Journal*. See Noblesala Aff., ECF No. 759; Noblesala Aff., ECF No. 760; Bell Aff., ECF No. 761.

14. In the ordinary course of business, the Debtors maintain books and records (the “**Books and Records**”) that reflect, among other things, the Debtors’ liabilities and the amounts thereof owed to their creditors.

15. The Debtors' claims register (the "**Claims Register**"), prepared and maintained by Epiq, reflects that approximately 6,053 proofs of claim (collectively, the "**Proofs of Claim**") have been filed in the Chapter 11 Cases asserting claims against the Debtors (each a "**Claim**," and collectively, the "**Claims**"). The Debtors and their advisors are continuing to comprehensively review and reconcile all Claims, including both the Claims listed on the Debtors' Chapter 11 Schedules and the Claims asserted in the Proofs of Claim (including any supporting documentation) filed in the Chapter 11 Cases. The Debtors and their advisors are also comparing the Claims asserted in the Proofs of Claims with the Debtors' Books and Records to determine the validity of the asserted Claims.

16. This reconciliation process includes identifying particular categories of Claims that the Debtors believe should be modified, reduced, reclassified, disallowed, and/or expunged. To avoid a possible double recovery or otherwise improper recovery by claimants, the Debtors will continue to file omnibus objections to such categories of Claims if and where warranted. This Objection is one such omnibus objection.

17. On February 17, 2021, the Court entered the Claims Objections Procedures Order [ECF No. 904]. Subsequently, the Court has sustained 16 omnibus claims objections filed by the Debtors in accordance the Claims Objections Procedures Order [ECF Nos. 1086–87, 1102, 1207–08, 1403–04, 1575, 1577–78, 1580–85].

18. The Debtors submit that this Objection and the notice provided to claimants in connection hereto are consistent with the Claims Objections Procedures Order, the Bankruptcy Code, and the Bankruptcy Rules.

Basis for Relief

19. Pursuant to section 101 of the Bankruptcy Code, a creditor holds a claim against a bankruptcy estate only to the extent that (a) it has a “right to payment” for the asserted liabilities and (b) the claim is otherwise allowable. 11 U.S.C. §§ 101(5) and 101(10).

20. When asserting a claim against a bankrupt estate, a claimant must allege facts that, if true, would support a finding that the debtor is legally liable to the claimant. *See In re Lehman Bros. Holdings, Inc.*, 602 B.R. 564, 574 (Bankr. S.D.N.Y. 2019); *In re Int’l Match Corp.*, 69 F.2d 73, 76 (2d Cir. 1934) (finding that a proof of claim should at least allege facts from which legal liability can be seen to exist). Where the claimant alleges sufficient facts to support its claim, its claim is afforded *prima facie* validity. *See In re Lehman Bros.*, 602 B.R. at 574. A party wishing to dispute such a claim must produce evidence in sufficient force to negate the claim’s *prima facie* validity. *See In re Dreier LLP*, 544 B.R. 760, 766 (Bankr. S.D.N.Y. 2016), *aff’d*, No. 08-15051 (SMB), 2016 WL 3920358 (S.D.N.Y. July 15, 2016), *aff’d*, 683 F. App’x 78 (2d Cir. 2017) (quoting *Creamer v. Motors Liquidation Co. GUC Trust (In re Motors Liquidation Co.)*, No. 12 CIV. 6074 (RJS), 2013 WL 5549643, at *3 (S.D.N.Y. Sept. 26, 2013) (in turn quoting *In re Allegheny Int’l, Inc.*, 954 F.2d 167, 173 (3d Cir. 1992))). In practice, the objecting party must produce evidence that would refute at least one of the allegations essential to the claim’s legal sufficiency. *See In re Dreier*, 544 B.R. at 766. Once the objecting party produces such evidence, the burden shifts back to the claimant to prove the validity of his or her claim by a preponderance of the evidence. *See id.*

21. A court should not deem a claim to be allowable if it is “unenforceable against the debtor and property of the debtor, under any agreement or applicable law.” 11. U.S.C. § 502(b)(1). A debtor may file an omnibus claims objection if all the claims being objected to fall under one of several listed categories as described in the Bankruptcy Rules and the Claims Objections Procedures

Order. *See* Fed. R. Bankr. P. 3007(d); Claims Obj. Proc. Order, ¶ 2(a), ECF No. 904 (providing additional bases under which the Debtors may file omnibus claim objections).

Objection

22. By this Objection, the Debtors object to the Claims set forth on the Schedules as follows:

Schedule	Objection Basis
1	Misclassified Unliquidated Claims ³
2 (a)	Wrong Debtor Claims
2 (b)	Wrong Debtor and Misclassified Unliquidated Claims
3 (a)	Incorrectly Classified Claims
3 (b)	Incorrectly Classified and Misclassified Unliquidated Claims
3 (c)	Incorrectly Classified and Wrong Debtor Claims
4	No Liability Claims
5	Satisfied Claims
6 (a)	Amended Claims
6 (b)	Duplicate Claims
7 (a)	Reduced Claims
7 (b)	Reduced and Incorrectly Classified Claims
8	Foreign Currency Claims

A. Misclassified Unliquidated Claims

23. The Debtors object to certain Claims listed on Schedules 1, 2(b), and 3(b) that all or a portion of the Claim is unliquidated (“**Misclassified Unliquidated Claims**”). Through this Objection, the Debtors seek to modify the Misclassified Unliquidated Claims as Claims for fixed amounts that are not “unliquidated.” While the Debtors at this time do not object to the stated amounts of such Claims, the Debtors’ Books and Records indicate that each Misclassified Unliquidated Claim is not unliquidated, nor are the claimants in connection with each Misclassified

³ Each capitalized term used in this paragraph 22 shall have the meaning ascribed to such term in this Objection.

Unliquidated Claim owed any additional unliquidated amounts in connection with their Misclassified Unliquidated Claim.

24. Pursuant to the Claims Objections Procedures Order, the Debtors may file omnibus claims objections to Claims that are “inconsistent with the Debtors’ books and records” or fail to “specify sufficiently the basis for the claim or provide sufficient supporting documentation for such claim.” Claims Obj. Proc. Order, ¶ 2(a)(i)–(ii).

25. To the extent the Misclassified Unliquidated Claims assert unliquidated claim amounts, such amounts are inconsistent with the Debtors’ Books and Records and are not supported by sufficient supporting documentation. In order to preserve the integrity and accuracy of the Claims Register, and to avoid the claimants from improperly receiving additional recoveries on account of their Misclassified Unliquidated Claims at the expense of the Debtors and other creditors, the Debtors request that the Misclassified Unliquidated Claims be modified as set forth on Schedules 1, 2(b), and 3(b), in the corresponding row labeled “Modified Claim.”

B. Wrong Debtor Claims

26. The Debtors object to the Claims listed on Schedules 2 and 3(c) as such Claims were each filed against an incorrect Debtor according to the Debtors’ Books and Records (“**Wrong Debtor Claims**”), and request that each Wrong Debtor Claim be modified as Claims against the proper Debtor.

27. A court should not deem a claim to be allowable if it is “unenforceable against the debtor and property of the debtor, under any agreement or applicable law.” 11 U.S.C. § 502(b)(1). Moreover, the Claims Objections Procedures Order authorizes the Debtors to file omnibus claims objections to claims “filed against ... the wrong Debtor.” Claims Obj. Proc. Order, ¶ 2(a)(iii).

28. After analyzing each Wrong Debtor Claim and reviewing the Books and Records, the Debtors have determined that each Wrong Debtor Claim has been filed against the incorrect Debtor. In order to preserve the integrity and accuracy of the Claims Register, and to avoid claimants from improperly receiving recoveries on a Claim, the Debtors seek to modify the Wrong Debtor Claims by reassigning the Claim from the Debtor against which such Claim was originally filed to the Debtor identified in the “Correct Debtor” column applicable thereto on Schedule 2 and 3(c).

C. Incorrectly Classified Claims

29. The Debtors object to the Claims listed on Schedules 3 and 7(b) and request that each such Claim be reclassified as set forth therein, as each of these Claims is not entitled to the asserted status or other priority (“**Incorrectly Classified Claims**”).

30. The Claims Objections Procedures Order authorizes the Debtors to file omnibus claims objections to Claims for which “[t]he claimant is not entitled to the asserted secured status or other priority.” Claims Obj. Proc. Order, ¶ 2(a)(v). After analyzing each Incorrectly Classified Claim and any documentation provided therewith, and after reviewing the Books and Records, the Debtors have determined that each Incorrectly Classified Claim, in part or in full, (i) does not accurately reflect the correct classification according to the Debtors’ Books and Records; (ii) was filed with insufficient documentation to support the asserted status or other priority thereon; and/or (iii) asserts a status or other priority that is not supported by the Bankruptcy Code or other applicable law. The specific basis for objection to each Incorrectly Classified Claim is set forth on Schedules 3 and 7(b) in the column labeled “Reason.”

31. The Debtors respectfully request that the Incorrectly Classified Claims be reclassified as set forth on Schedules 3 and 7(b) in the corresponding row labeled “Modified Claim,” to avoid

claimants from improperly receiving recoveries on account of an Incorrectly Classified Claim at the expense of the Debtors and other creditors.

D. No Liability Claims

32. The Debtors object to the Claims listed on Schedule 4 and request that each such Claim be disallowed and expunged in its entirety, as such Claims seek to recover amounts for which the Debtors are not liable (“**No Liability Claims**”).

33. A court should not deem a claim to be allowable if it is “unenforceable against the debtor and property of the debtor, under any agreement or applicable law.” 11 U.S.C. § 502(b)(1). After analyzing each No Liability Claim and reviewing the Books and Records, the Debtors have determined that the No Liability Claims (i) fail to establish a basis for a valid claim against the Debtors and (ii) seek recovery for amounts for which the Debtors are not liable. The specific basis for objection to each No Liability Claim is set forth on Schedule 4 in the column labeled “Reason.”

34. In order to preserve the integrity and accuracy of the Claims Register, and to avoid claimants from improperly receiving recoveries on account of the No Liability Claims at the expense of the Debtors and other creditors, the Debtors respectfully request that each No Liability Claim be disallowed and expunged in its entirety.

E. Satisfied Claims

35. The Debtors object to the Claims listed on Schedule 5 (the “**Satisfied Claims**”) and request that each such Satisfied Claim be disallowed and expunged in its entirety, as (i) each Satisfied Claim has been paid or otherwise satisfied by the Debtors after the Petition Date, “in accordance with the Bankruptcy Code, applicable rules, or a court order,” see Fed. R. Bankr. P. 3007(d)(5), including pursuant to the Court’s First Day Orders, or (ii) has been satisfied in full by a party that is not a Debtor.

36. As the Debtors do not owe any further amounts with respect to the Satisfied Claims, to avoid the same claimant from improperly receiving multiple recoveries at the expense of the Debtors and other creditors, the Debtors request that the Satisfied Claims be disallowed and expunged in their entirety.

F. Amended and Duplicate Claims

37. The Debtors object to the Claims listed on Schedule 6 and request that such Claims be disallowed and expunged in their entirety, as (i) the Claims set forth on Schedule 6(a) have been amended or superseded by other Claims filed by or on behalf of the same claimants relating to the same purported liabilities (“**Amended Claims**”) and (ii) the Claims set forth on Schedule 6(b) are duplicative of other Claims filed by or on behalf of the same claimant relating to the same purported liability (“**Duplicate Claims**”).

38. A debtor cannot be required to pay the same claim multiple times. *See, e.g., Phelan v. Local 305 of United Ass’n of Journeymen & Apprentices of Plumbing and Pipefitting Indus. of U.S. & Can.*, 973 F.2d 1050, 1063 (2d Cir. 1992); *see also In re Finley, Kumble, Wagner, Heine, Underberg, Manley, Myerson & Carey*, 160 B.R. 882, 894 (Bankr. S.D.N.Y. 1993) (“In bankruptcy, multiple recoveries for an identical injury are generally disallowed.”). This Court has routinely sustained objections to amended, superseded, and duplicative claims. *See, e.g., In re LATAM Airlines Group S.A.*, No. 20-11254 (JLG) (Bankr. S.D.N.Y. Aug 3, 2021) [ECF No. 2846]; *In re Centric Brands, Inc.*, No. 20-22637 (SHL) (Bankr. S.D.N.Y. June 15, 2021) [ECF No. 926]; *In re Ditech Holding Corp.*, No. 19-10412 (JLG) (Bankr. S.D.N.Y. Apr. 12, 2021) [ECF No. 3317]; *In re Windstream Holdings, Inc.*, No. 19-22397 (RDD) (Bankr. S.D.N.Y. Dec. 21, 2020) [ECF No. 2758].

39. If the Amended and Duplicate Claims identified on Schedule 6 are not disallowed, the claimants identified therein may obtain double recovery from the same alleged liability, at the

expense of the Debtors and other creditors. By this Objection, the Debtors seek disallowance and expungement of the Amended and Duplicate Claims in order to limit each claimant to a single Claim and recovery against the applicable Debtor's estate arising from the same alleged liability.

40. For each of the Amended and Duplicate Claims, the Debtors have identified a surviving Claim ("**Surviving Claim**"), which asserts the same liability and is identified on Schedule 6 in the applicable row labeled "Surviving Claim." Surviving Claims will be unaffected by the relief requested in this Objection, and each claimant's rights to assert these liabilities against the applicable Debtor's estate will be preserved, subject to the Debtors' reservations of their rights to object to such Surviving Claims and other Claims on all grounds, whether legal, factual, procedural, substantive, or non-substantive.

G. Reduced Claims

41. The Debtors object to the Claims listed on Schedule 7 and request that each such Claim be modified, as each such Claim (i) seeks to recover amounts in excess of what is reflected on the Debtors' Books and Records and/or (ii) was filed with insufficient documentation to support the asserted Claim amount (collectively, "**Reduced Claims**").

42. The Claims Objections Procedures Order authorizes the Debtors to file omnibus claims objections if "[t]he amount claimed is inconsistent with the Debtors' books and records and the Debtors, after review and consideration of any information provided by the claimant, deny liability in excess of the amount reflected in the Debtors' books and records" and/or if a claimant "fails to specify sufficiently the basis for the claim or provide sufficient supporting documentation for such claim." Claims Obj. Proc. Order, ¶ 2(a)(i) and (ii). After analyzing each of the Reduced Claims and any documentation provided therewith, the Debtors have determined that the asserted

amount of each of Reduced Claim is greater than what the Debtors' reflect on their Books and Records and/or is not supported by the documentation provided by the claimant.

43. In order to preserve the integrity and accuracy of the Claims Register, and to avoid claimants from improperly receiving recoveries in excess of what they are entitled at the expense of the Debtors and other creditors, the Debtors respectfully request that the Court modify the amount of the Reduced Claims such that the amount of each Reduced Claim corresponds with the documentation provided with the asserted proof of claim (the "**Reduction**"), as set forth in more detail on Schedule 7 in the corresponding row labeled "Reduced Claim."

H. Foreign Currency Claims

44. The Debtors object to the Claims set forth on Schedule 8 and request that each such Claim be converted to United States dollars as set forth therein, as such Claims were asserted in a currency other than United States dollars or Mexican pesos (the "**Foreign Currency Claims**").

45. The Claims Objections Procedures Order authorizes the Debtors to file omnibus claims objections to Claims filed in a currency other than United States dollars or Mexican Pesos. *See* Claims Obj. Proc. Order, ¶ 2(a)(iv). Nonetheless, through this Objection, the Debtors are *not* seeking to disallow Foreign Currency Claims. Rather, the Debtors only seek to convert such Claims to United States dollars—by first converting such Claims to Mexican pesos and then converting each such Claim from Mexican pesos to United States dollars—based on the applicable conversion rate in place on the Petition Date from Banco de Mexico (Central Bank) in accordance with the Bar Date Order. *See* Bar Date Order, ¶ 8(c), n.4 ("Where a claim has been denominated in Mexican Pesos on a Proof of Claim, the Debtors will convert such claim to one calculated in legal tender of the United States based upon the conversion rate in place as of the Petition Date from Banco de Mexico (Central Bank).").

46. Accordingly, the Debtors respectfully request that the Court modify the amount of each Foreign Currency Claim to reflect a Claim in United States dollars as set forth on Schedule 8 in the corresponding row labeled “Modified Claim.”

Separate Contested Matters

47. Each of the Claims and the Objection with respect thereto constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. The Debtors request that any order entered by this Court with respect to a request for disallowance, expungement, modification, reduction, and/or reclassification herein shall be deemed a separate order with respect to each Claim.

Response to Omnibus Objections

48. To contest this Objection, a claimant must file and serve a written response to this Objection (a “**Response**”) so that it is received no later than the deadline set forth in the accompanying notice (the “**Response Deadline**”). All Responses shall be filed electronically with the Court on the docket of *In re Grupo Aeroméxico, S.A.B. de C.V., et al.*, Case No. 20-11563 (SCC), in accordance with the Court’s General Order M-399 (available on the Court’s website at <http://www.nysb.uscourts.gov>), by registered users of the Court’s electronic case filing (“**ECF**”) system, and served (via email or otherwise) so as to be actually received on or before the Response Deadline upon:

Davis Polk & Wardwell LLP
450 Lexington Avenue
New York, New York 10017
Attn: Timothy Graulich (timothy.graulich@davispolk.com)
Stephen D. Piraino (stephen.piraino@davispolk.com)
Erik P. Jerrard (erik.jerrard@davispolk.com)
Richard J. Steinberg (richard.steinberg@davispolk.com)
Counsel to the Debtors

-and-

Willkie Farr & Gallagher LLP
787 Seventh Avenue
New York, New York 10019
Attn: Brett H. Miller (bmiller@willkie.com)
Todd M. Goren (tgoren@willkie.com)
Craig Damast (cdamast@willkie.com)
Debra M. Sinclair (dsinclair@willkie.com)
Counsel to the Creditors' Committee.

49. Every Response to this Objection must contain, at a minimum, the following information:

- a. A caption setting forth the name of the Bankruptcy Court, the names of the Debtors, the case number, and title of the Objection to which the response is directed;
- b. The name of the claimant and a description of the basis for the amount of the Claim;
- c. A concise statement setting forth the reasons why the Claim should not be disallowed, expunged, reduced, or reclassified for the reasons set forth in the Objection, including, but not limited to, the specific factual and legal bases upon which will be relied on in opposing the Objection;
- d. All documentation or other evidence of the Claim, to the extent not included with the Proof of Claim previously filed with the Bankruptcy Court, upon which will be relied on in opposing the Objection; and
- e. The address(es) to which the Debtors must return any reply to the Response, if different from that presented in the Proof of Claim; and
- f. The name, address, and telephone number of the person (which may be the claimant or their legal representative) possessing ultimate authority to reconcile, settle, or otherwise resolve the Claim on the claimant's behalf.

50. If a claimant fails to file and serve a timely Response by the Response Deadline, the Debtors may present to the Court an appropriate order disallowing, expunging, modifying, reducing, and/or reclassifying their Claim(s), without further notice or a hearing.

Reservation of Rights

51. The Debtors expressly reserve the right to amend, modify, or supplement this Objection, including, without limitation, to modify the currency associated with each Claim set forth on the Schedules. The Debtors further reserve their right to object to the: (i) Misclassified Unliquidated Claims; (ii) Wrong Debtor Claims; (iii) Incorrectly Classified Claims; (iv) No Liability Claims; (v) Satisfied Claims; (vi) Amended Claims; (vii) Duplicate Claims; (viii) Reduced Claims; and/or (ix) Foreign Currency Claims on any other grounds that the Debtors discover or elect to pursue, unless such Claims are disallowed and expunged from the Claims Register. The Debtors reserve their right to assert substantive and/or one or more additional non-substantive objections to the Claims subject to this Objection at a later time.

52. Notwithstanding anything contained in this Objection, the exhibits attached hereto, or the Schedules, nothing herein shall be construed as a waiver of any rights that the Debtors may have to (i) commence avoidance actions under the applicable sections of the Bankruptcy Code, including, but not limited to, sections 547 and 548 of the Bankruptcy Code, against the claimants subject to this Objection, (ii) enforce the Debtors' rights of setoff against the claimants relating to such avoidance actions, or (iii) seek disallowance pursuant to section 502(d) of the Bankruptcy Code of Claims of the claimants that are subject to such avoidance actions.

Notice

53. Notice of this Objection will be given to (i) the United States Trustee for the Southern District of New York; (ii) each party listed on the Schedules; (iii) each party listed in paragraph 2(h)

of the Claims Objections Procedures Order; and (iv) all parties requesting notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, under the circumstances, no other or further notice is required.

No Prior Request

54. The Debtors have not previously sought the relief requested herein from the Court or any other court.

[Remainder of Page Intentionally Left Blank]

WHEREFORE, the Debtors respectfully request entry of the Proposed Order, substantially in the form attached hereto as **Exhibit 1**, granting the relief requested herein, and such other and further relief as the Court deems just and proper.

Dated: August 18, 2021
New York, New York

DAVIS POLK & WARDWELL LLP

By: /s/ Timothy Graulich

450 Lexington Avenue
New York, New York 10017
Telephone: (212) 450-4000
Facsimile: (212) 701-5800
Marshall S. Huebner
Timothy Graulich
James I. McClammy
Stephen D. Piraino
Erik Jerrard (admitted *pro hac vice*)

*Counsel to the Debtors
and Debtors in Possession*

Exhibit 1 to Objection

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**GRUPO AEROMÉXICO, S.A.B. de C.V., et al.,

Debtors.¹**

Chapter 11

Case No. 20-11563 (SCC)

(Jointly Administered)

**ORDER GRANTING DEBTORS' SEVENTEENTH OMNIBUS CLAIMS OBJECTION
TO PROOFS OF CLAIM (MISCLASSIFIED UNLIQUIDATED, WRONG DEBTOR,
INCORRECTLY CLASSIFIED, NO LIABILITY, SATISFIED, AMENDED,
DUPLICATE, REDUCED, AND/OR FOREIGN CURRENCY CLAIMS)**

Upon the objection (the “**Objection**”)² of the above-captioned Debtors, pursuant to sections 105 and 502 of the Bankruptcy Code and Bankruptcy Rule 3007, seeking to (a) modify, reduce, and/or reclassify the Claims identified on **Schedules 1, 2, 3, 7, and 8** attached hereto, as described therein and (b) disallow and expunge the Claims identified on **Schedules 4, 5, and 6** attached hereto; and upon the Sánchez Declaration, attached to the Objection as **Exhibit 2**; and the Court having jurisdiction to consider the matters raised in the Objection pursuant to 28 U.S.C. § 1334 and the *Amended Standing Order of Reference M-431*, dated January 31, 2012 (Preska, C.J.); and the Court having authority to hear the matters raised in the Objection pursuant to 28 U.S.C. § 157; and venue being proper before this Court pursuant to 28 U.S.C. § § 1408 and 1409; and consideration of the Objection and the relief requested therein being a core proceeding that the Court can determine pursuant to 28 U.S.C. § 157(b)(2); and due and proper notice of the Objection and opportunity for a

¹ The Debtors in these cases, along with each Debtor’s registration number in the applicable jurisdiction, are as follows: Grupo Aeroméxico, S.A.B. de C.V. 286676; Aerovías de México, S.A. de C.V. 108984; Aerolitoral, S.A. de C.V. 217315; and Aerovías Empresa de Cargo, S.A. de C.V. 437094-1. The Debtors’ corporate headquarters is located at Paseo de la Reforma No. 243, piso 25 Colonia Cuauhtémoc, Mexico City, C.P. 06500.

² Each capitalized term used herein but not otherwise defined herein shall have the meaning ascribed to it in the Objection.

hearing on the Objection having been given to the parties listed therein, and it appearing that no other or further notice need be provided; and the Court having reviewed and considered the Objection; and the Court having the opportunity to hold a hearing on the Objection; and the Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and the Court having found that the relief granted herein being in the best interests of the Debtors, their creditors, and all other parties in interest; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Objection is hereby granted as set forth herein.
2. The Claims identified on **Schedules 1, 2(b), and 3(b)** annexed hereto are hereby modified as described therein such that each Misclassified Unliquidated Claim shall not be considered unliquidated for any purpose in the Chapter 11 Cases.
3. The Claims identified on **Schedules 2 and 3(c)** annexed hereto are hereby modified as described therein such that each Wrong Debtor Claim is hereby reassigned from the Debtor against which such Claim was originally filed to the Debtor identified in the column labeled “Correct Debtor(s)” applicable thereto on **Schedules 2 and 3(c)**.
4. The Incorrectly Classified Claims identified on **Schedules 3 and 7(b)** annexed hereto are hereby reclassified as described in the corresponding row labeled “Modified Claim” on **Schedules 3 and 7(b)** and, to the extent reclassified by this Order, shall not be considered secured, administrative, and/or priority Claims, as applicable, for any purpose in the Chapter 11 Cases.
5. The No Liability Claims identified on **Schedule 4** annexed hereto are hereby disallowed and expunged in their entirety.

6. The Satisfied Claims identified on **Schedule 5** annexed hereto are hereby disallowed and expunged in their entirety.

7. The Amended and Duplicate Claims identified on **Schedule 6** annexed hereto are hereby disallowed and expunged in their entirety.

8. The Reduced Claims identified on **Schedule 7** annexed hereto are hereby modified and reduced as set forth therein, and shall be reflected in the Claims Register in the amounts set forth on **Schedule 7** in the column labeled “Reduced Claim Amount.”

9. The Foreign Currency Claims identified on **Schedule 8** annexed hereto are hereby modified as described in the corresponding row labeled “Modified Claim” on **Schedule 8**.

10. All Claims identified on **Schedule 6** annexed hereto as a “Surviving Claim” will be unaffected by the relief granted herein, and the claimants’ rights to assert the liabilities in connection with the Surviving Claims against the applicable Debtor’s estate will be preserved, subject to the Debtors’ reservations of their rights to object to such Surviving Claims on all grounds, whether legal, factual, procedural, substantive, or non-substantive.

11. All Claims listed on the Schedules annexed hereto that were not asserted in United States dollars are hereby modified to be Claims listed in United States dollars, as described in the respective Schedules attached hereto.

12. This Order shall be deemed a separate Order with respect to each of the Claims identified on the Schedules annexed hereto. Any stay of this Order pending appeal by any claimants whose Claims are subject to this Order shall only apply to the contested matter that involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

13. The Debtors, Epiq Corporate Restructuring, LLC, and the Clerk of this Court are authorized to take, or refrain from taking, any action necessary or appropriate to implement the terms of, and the relief granted in, this Order without seeking further order of the Court.

14. Notwithstanding any Bankruptcy Rule, the Local Bankruptcy Rules for the Southern District of New York, or otherwise, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

15. This Court shall retain jurisdiction to hear and determine all matters arising from, arising under, or related to the Chapter 11 Cases, to the fullest extent permitted by law, including, without limitation, to enforce this Order.

Dated: _____, 2021
New York, New York

THE HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE

Schedule 1

Misclassified Unliquidated Claims

Misclassified Unliquidated Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated
1	20028	No	Aerolitoral, S.A. De C.V.	OPERADORA PASEO TABASCO SA DE CV AV PASEO TABASCO NO 1417 COL TABASCO 2000	0.00	0.00	0.00	257.64	257.64 USD	Yes
	Date Filed: 9/12/2020									
	Modified Claim 20028				0.00	0.00	0.00	257.64	257.64 USD	No
2	20026	No	Aerovías de México, S.A. De C.V.	OPERADORA PASEO TABASCO SA DE CV AV PASEO TABASCO NO 1417 VILLAHERMOSA, 27, 86035	0.00	0.00	0.00	2,396.87	2,396.87 USD	Yes
	Date Filed: 9/10/2020									
	Modified Claim 20026				0.00	0.00	0.00	2,396.87	2,396.87 USD	No
Unliquidated Claims Total		Count	USD	2	0.00	0.00	0.00	2,654.51	2,654.51	

*Pursuant to ¶ 8(d), n.4 of the Order (I) Establishing Deadline for Filing Proofs of Claim and Procedures Relating Thereto and (II) Approving the Form and Manner of Notice Thereof [ECF No. 648] (the “Bar Date Order”), certain Claims that were originally denominated in Mexican pesos have been converted to United States dollars, based upon the conversion rate in place as of June 30, 2020 from Banco de Mexico (Central Bank).

Schedule 2 to Proposed Order

(a) Wrong Debtor Claims

(b) Wrong Debtor and Misclassified Unliquidated Claims

Wrong Debtor Claims

Ref	Claim #	Transferred	Name and Address of Claimant	Wrong Debtor	Correct Debtor	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated
1	20499	No	AGENCIA DE VIAJES Y TURISMO AVIATUR SA CALLE 20 NO.4 55 BOGOTA BOGOTA 110311	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	245,010.71	0.00	0.00	245,010.71 USD	No
Date Filed:	1/22/2021										
2	10154	No	ALLIANCE TRANSPORT ET PROXIMITE 20 E RUE DU DOCTEUR ROUX PARIS, FR, 93120	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	0.00	0.00 USD	No
Date Filed:	8/14/2020										
3	14565	No	AMERICAN AIRLINES INC ATTN DONALD BROADFIELD JR 1 SKYVIEW DR, MD 8B503 FORT WORTH, TX, 76155	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	5,020.07	5,020.07 USD	No
Date Filed:	1/15/2021										
4	14064	No	INNGENIA PRODUCCIONES INNPRO S.A. RUMIPAMBA E2 14 Y AV REPUBLICA QUITO PICHINCHA, ECUADOR	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	513.00	513.00 USD	No
Date Filed:	1/14/2021										
5	10234	No	CIT BANK NA C/O BANKRUPTCY PROCESSING SOLUTIONS INC PO BOX 593007 SAN ANTONIO, TX, 78259	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	1,245.04	1,245.04 USD	Yes
Date Filed:	9/22/2020										
6	10235	No	CIT BANK NA C/O BANKRUPTCY PROCESSING SOLUTIONS INC PO BOX 593007 SAN ANTONIO, TX, 78259	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	418.24	418.24 USD	Yes
Date Filed:	9/22/2020										

*Pursuant to ¶ 8(d), n.4 of the Order (I) Establishing Deadline for Filing Proofs of Claim and Procedures Relating Thereto and (II) Approving the Form and Manner of Notice Thereof [ECF No. 648] (the "Bar Date Order"), certain Claims that were originally denominated in Mexican pesos have been converted to United States dollars, based upon the conversion rate in place as of June 30, 2020 from Banco de Mexico (Central Bank).

Wrong Debtor Claims

Ref	Claim #	Transferred	Name and Address of Claimant	Wrong Debtor	Correct Debtor(s)	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated
7	10236	No	CIT BANK NA C/O BANKRUPTCY PROCESSING SOLUTIONS INC PO BOX 593007 SAN ANTONIO, TX, 78259	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	3,107.82	3,107.82 USD	Yes
	Date Filed:	9/22/2020									
8	10237	No	CIT BANK NA C/O BANKRUPTCY PROCESSING SOLUTIONS INC PO BOX 593007 SAN ANTONIO, TX, 78259	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	2,580.67	2,580.67 USD	Yes
	Date Filed:	9/22/2020									
9	10238	No	CIT BANK NA C/O BANKRUPTCY PROCESSING SOLUTIONS INC PO BOX 593007 SAN ANTONIO, TX, 78259	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	22,966.52	22,966.52 USD	Yes
	Date Filed:	9/22/2020									
10	10239	No	CIT BANK NA C/O BANKRUPTCY PROCESSING SOLUTIONS INC PO BOX 593007 SAN ANTONIO, TX, 78259	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	3,107.85	3,107.85 USD	Yes
	Date Filed:	9/22/2020									
11	13052	No	CITY & COUNTY DENVER, DEPT OF AVIATION 8500 PENA BLVD, AOB RM 9810 DENVER, CO 80249	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	165,558.86	165,558.86 USD	No
	Date Filed:	1/12/21									
12	677	No	DAYS HOTEL & SUITES INCHEON AIRPORT C/O MIRAE INVESTMENT CO LTD 6 SINDOSINAM-RO 142 BUNGIL JUNG-GU INCHEON 22371	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	71,600.00	71,600.00 USD	No
	Date Filed:	1/25/2021									
13	87	No	FEDEX CORPORATE SERVICES INC AS ASSIGNEE C/O FEDEX EXPRESS/GROUND/FREIGHT/OFFICE 3965 AIRWAYS BLVD, MODULE G 3RD FL MEMPHIS, TN, 38116-5017	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	365,924.07	365,924.07 USD	No
	Date Filed:	9/18/2020									
14	14613	No	FRESNO COUNTY TAX COLLECTOR PO BOX 1192 FRESNO, CA, 93715	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	3,761.84	3,761.84 USD	No
	Date Filed:	1/15/2021									

Wrong Debtor Claims

Ref	Claim #	Transferred	Name and Address of Claimant	Wrong Debtor	Correct Debtor(s)	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated
15	88	No	INTERTRUST (CURACAO) BV 14, KAYA WFG (JOMBI) MENSING WILLEMSTAD	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	12,920.25	12,920.25 USD	No
	Date Filed:	9/24/2020									
16	14699	No	JAMCO SINGAPORE PTE LTD NO 8 LOYANG LANE SINGAPORE 508915	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	174,700.00	174,700.0 0 USD	No
	Date Filed:	1/16/2021									
17	14710	No	JAMCO SINGAPORE PTE LTD ATTN ADELINE KAN NO 8, LOYANG LANE SINGAPORE 508915	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	102,447.00	102,447.0 0 USD	No
	Date Filed:	1/18/2021									
18	62	No	KELLSTROM COMMERCIAL AEROSPACE INC 3430 DAVIE RD, STE 302 DAVIE, FL, 33314	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	27,682.08	27,682.08 USD	No
	Date Filed:	8/18/2020									
19	11900	No	MOVABLE INC 5 BRYANT PARK 1065 6TH AVE, 9TH FL NEW YORK, NY, 10018	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	8,411.18	8,411.18 USD	No
	Date Filed:	1/6/2021									
20	380	No	NEW GEN AEROSPACE CORP 290 PARK AVE LAKE VILLA, IL, 60046	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	19,391.32	19,391.32 USD	No
	Date Filed:	1/14/2021									
21	119	No	RENAISSANCE HOTEL MANAGEMENT COMPANY LLC 12740 HILLCREST RD, STE 240 DALLAS, TX, 75230	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	18,957.74	18,957.74 USD	No
	Date Filed:	11/2/2020									
22	89	No	SCJ SERVICES SA DE CV 100 C 18 MERIDA YUCATAN, 97305	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	411.36	411.36 USD	No
	Date Filed:	9/28/2020									
23	12911	No	SELECTOUR ENTREPRISE 17 AVENUE HONORÉ SERRES TOULOUSE 31000	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	20,300.03	20,300.03 USD	No
	Date Filed:	1/12/2021									

Wrong Debtor Claims

Ref	Claim #	Transferred	Name and Address of Claimant	Wrong Debtor	Correct Debtor(s)	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated
24	235	No	TE CONNECTIVITY CORPORATION ATTN JEFF ROWOTH, GLOBAL TRAVEL MANAGER 2800 FULLING MILL RD, MAILSTOP 060 MIDDLETOWN, PA, 17057-3142	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	3,179.81	3,179.81 USD	No
	Date Filed:	1/4/2021									
25	14016	No	TRAVEL COUNSELLORS LTD ATTN ANDY BARLOW VENUS NO.1 OLD PARK LANE MANCHESTER M41 7HA	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	5,576.02	5,576.02 USD	No
	Date Filed:	1/14/2021									
26	32	No	TURBINE KINETICS INC 60 SEQUIN DR GLASTONBURY, CT, 06033	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	18,142.40	18,142.40 USD	No
	Date Filed:	7/17/2020									
27	104	No	WELLS FARGO FINANCIAL LEASING INC 800 WALNUT ST, MAC F0005-055 DES MOINES, IA, 50309	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	87,858.82	87,858.82 USD	No
	Date Filed:	10/5/2020									
28	58	No	WEST ISLAND HOTELS INC 6700 TRANSCANADA HWY POINTE-CLAIRE, QC, H9R 1C2	Grupo Aeroméxico, S.A.B. De C.V.	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	19,264.00	19,264.00 USD	No
	Date Filed:	8/17/2020									
Wrong Debtor Claim Totals:			Count:	USD	28	0.00	245,010.71	0.00	1,165,045.99	1,410,056.70	

Wrong Debtor Claims and Unliquidated Claims

Ref	Claim #	Transferred	Wrong Debtor	Correct Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated
	20260	No	Grupo Aeroméxico, S.A.B. De C.V.		NAUTALIA VIAJES SL CALLE MAHONIA N° 2 EDIFICIO PORTICO PLANTA 3 MADRID 28043	0.00	0.00	0.00	5,902.12	5,902.12 USD	Yes
Date Filed:	1/13/2021										
Modified Claim	20260			Aerovías De México, S.A. De C.V.		0.00	0.00	0.00	5,902.12	5,902.12 USD	No
	20117	No	Grupo Aeroméxico, S.A.B. De C.V.		DOMINGUEZ, HERIBERTO JESUS LECHUGA GRANERO 18 LOMAS DE SAN ANGEL INN ALVARON OBREGON CIUDAD DE MEXICO, CD 01790	0.00	0.00	0.00	1,213.46	1,213.46 USD	Yes
Date Filed:	12/15/2020										
Modified Claim	20117			Aerovías De México, S.A. De C.V.		0.00	0.00	0.00	1,213.46	1,213.46 USD	No
Wrong Debtor Claims and Incorrectly Classified Claim Totals			Count:	USD	2	0.00	0.00	0.00	7,115.58	7,115.58	

*Pursuant to ¶ 8(d), n.4 of the Order (I) Establishing Deadline for Filing Proofs of Claim and Procedures Relating Thereto and (II) Approving the Form and Manner of Notice Thereof [ECF No. 648] (the “Bar Date Order”), certain Claims that were originally denominated in Mexican pesos have been converted to United States dollars, based upon the conversion rate in place as of June 30, 2020 from Banco de Mexico (Central Bank).

Schedule 3 to Proposed Order

- (a) Incorrectly Classified Claims**
- (b) Incorrectly Classified and Misclassified Unliquidated Claims**
- (c) Incorrectly Classified and Wrong Debtor Claims**

Incorrectly Classified Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
1	10203	No	Aerovías De México, S.A. De C.V.	BRIDGESTONE AIRCRAFT TIRE (USA) INC C/O WALLER LANSDEN DORTCH & DAVIS LLP ATTN EVAN ATKINSON 100 CONGRESS AVE, 18TH FL AUSTIN, TX 78701	66,000.00	132,000.00	0.00	281,025.00	479,025.00 USD	No	Insufficient documentation to support secured, priority claim. A portion of the claim was delivered within 20 days, \$66,000 is entitled to administrative claim (§ 503(b)(9))
	Date Filed: 8/31/2020										
	Modified Claim	10203			0.00	66,000.00	0.00	413,025.00	479,025.00 USD	No	
2	20029	No	Aerovías De México, S.A. De C.V.	GARCIA & BODAN HONDURAS SA LOMAS DEL GUJARRO EDIFICIO CORPORATIVO ORION 1ER NIVEL NO 105 TEGUCIGALPA, FM, 11101	12,154.07	12,154.07	0.00	12,154.07	12,154.07 USD	No	Insufficient documentation to support secured, priority claim. No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	Date Filed: 9/14/2020										
	Modified Claim	20029			0.00	0.00	0.00	12,154.07	12,154.07 USD	No	
3	10246	No	Aerovías De México, S.A. De C.V.	HENSLEY, JOHN AND WANDA 203 E COLORADO BLVD DALLAS, TX, 75203	0.00	0.00	27,238.18	0.00	27,238.18 USD	No	Insufficient documentation to support priority claim
	Date Filed: 9/23/2020										
	Modified Claim	10246			0.00	0.00	0.00	27,238.18	27,238.18 USD	No	
4	10001	No	Aerovías De México, S.A. De C.V.	HIHCL HP AMSTERDAM AIRPORT B V RIJNLANDERWEG 800 HOOFDDORP, NH, 2132 NN	0.00	86,427.40	0.00	1,862.50	88,289.90 USD	No	No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	Date Filed: 7/14/2020										
	Modified Claim	10001			0.00	0.00	0.00	88,289.90	88,289.90 USD	No	

Incorrectly Classified Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
5	702	No	Aerovías De México, S.A. De C.V.	HOTEL COLON INTERNACIONALCA N 19-14 Y AV AMAZONAS Y PATRIA QUITO EC	10,773.33	0.00	0.00	0.00	10,773.33 USD	No	Insufficient documentation to support secured claim
	Date Filed: 2/8/2021										
	Modified Claim				0.00	0.00	0.00	10,773.33	10,773.33 USD	No	
6	20123	No	Aerovías De México, S.A. De C.V.	HOTELES DE LA RECOLETA SAS CARRERA 10 26 21 BOGOTA DC 111321	12,414.76	0.00	0.00	0.00	12,414.76 USD	No	Insufficient documentation to support secured claim
	Date Filed: 12/16/2020										
	Modified Claim				0.00	0.00	0.00	12,414.76	12,414.76 USD	No	
7	20315	No	Aerovías De México, S.A. De C.V.	INTEGRACION AGENCIA DE VIAJES SA DOCTOR ESQUERDO 136 - 7PLANTA MADRID 28007	6,192.00	0.00	0.00	0.00	6,192.00 USD	No	Insufficient documentation to support secured claim
	Date Filed: 1/14/2021										
	Modified Claim				0.00	0.00	0.00	6,192.00	6,192.00 USD	No	

Incorrectly Classified Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
8	10313	No	Aerolitoral, S.A. De C.V.	MELIKIAN, JOHN SYNCHROTECH, INC. 7536 TYRONE AVE. VAN NUYS VAN NUYS, CA, 91405	0.00	3,225.00	0.00	0.00	3,225.00 USD	No	Goods not delivered within 20 days and are not entitled to administrative claim (§ 503(b)(9))
	Date Filed: 12/8/2020										
	Modified Claim				0.00	0.00	0.00	3,225.00	3,225.00 USD	No	
9	192	No	Aerovías De México, S.A. De C.V.	MIDFIELD CONCESSION ENTERPRISES INC 6810 METROPLEX DR ROMULUS, MI, 48174	193.50	0.00	0.00	0.00	193.50 USD	No	Insufficient documentation to support secured claim
	Date Filed: 12/28/2020										
	Modified Claim				0.00	0.00	0.00	193.50	193.50 USD	No	
10	14603	No	Aerovías De México, S.A. De C.V.	YPF CHILE SA MACACHA GUEMES 515 CIUDAD A. DE BUENOS AIRES S.A.	0.00	59,311.10	0.00	28,442.71	87,753.81 USD	No	Only goods related to invoice 183486 were received within 20 days, other goods were delivered outside the 20 days and are not entitled to administrative claim (§ 503(b)(9))
	Date Filed: 1/15/2021										
	Modified Claim				0.00	18,601.78	0.00	69,152.03	87,753.81 USD	No	
Incorrectly Classified Claims Total			Count:	USD	10	107,727.66	293,117.57	27,238.18	323,484.28	727.259.55	

Incorrectly Classified and Unliquidated Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
1	20402	No	Aerovías De México, S.A. De C.V.	4F SERVICIOS INTEGRALES EN COMUNICACION HERSCHELL 37, ANZURES	0.00	0.00	1,111.13	0.00	1,111.13 USD	Yes	Insufficient documentation to support priority claim
	Date Filed:	1/14/2021									
	Modified Claim	20402			0.00	0.00	0.00	1,111.13	1,111.13 USD	No	
2	20378	No	Aerovías De México, S.A. De C.V.	AGENCIA DE VIAJES SOLEI SA DE CV AV ABRAHAM LINCOLN 1093 INT 2 CIUDAD JUAREZ, CH 32310	165.96	0.00	0.00	0.00	165.96 USD	Yes	Insufficient documentation to support secured, priority claim
	Date Filed:	1/14/2021									
	Modified Claim	20378			0.00	0.00	0.00	165.96	165.96 USD	No	
3	20023	No	Aerovías De México, S.A. De C.V.	ARRENDADORA LOS ANGELES VALLARTA SA D CV * NO ADDRESS PROVIDED * BAHIA DE BANDERAS NA,63732	527.86	0.00	527.86	0.00	527.86 USD	Yes	Insufficient documentation to support secured, priority claim
	Date Filed:	9/9/2020									
	Modified Claim	20023			0.00	0.00	0.00	527.86	527.86 USD	No	
4	20009	No	Aerolitoral, S.A. De C.V.	GARCIA, ISEDI YAMILETH ROMO AV ARQUEROS #1034, VISTAS DEL SOL III AGUASCALIENTES, AGS 20264	0.00	0.00	1,123.09	0.00	1,123.09 USD	Yes	Insufficient documentation to support priority claim
	Date Filed:	8/17/2020									
	Modified Claim	20009			0.00	0.00	0.00	1,123.09	1,123.09 USD	No	

*Pursuant to ¶ 8(d), n.4 of the Order (I) Establishing Deadline for Filing Proofs of Claim and Procedures Relating Thereto and (II) Approving the Form and Manner of Notice Thereof [ECF No. 648] (the “Bar Date Order”), certain Claims that were originally denominated in Mexican pesos have been converted to United States dollars, based upon the conversion rate in place as of June 30, 2020 from Banco de Mexico (Central Bank).

Incorrectly Classified and Unliquidated Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
5	20043	No	Aerovías De México, S.A. De C.V.	IMPORTACIONES COLOMBRES SA DE CV AV RODOLFO GAONA 86 E CDMX	143,487.14	0.00	0.00	0.00	143,487.14 USD	Yes	Insufficient documentation to support secured claim
	Date Filed:	10/27/2020									
	Modified Claim	20043			0.00	0.00	0.00	143,487.14	143,487.14 USD	No	
6	20018	No	Aerovías De México, S.A. De C.V.	OPERADORA DIESTRA CANCUN SA DE CV ATTN RETORNO GUCUMATZ BENITO JUAREZ CANCUN QR	0.00	0.00	132,478.65	0.00	132,478.65 USD	Yes	Insufficient documentation to support priority claim
	Date Filed:	9/4/2020									
	Modified Claim	20018			0.00	0.00	0.00	132,478.65	132,478.65 USD	No	
7	20040	No	Aerolitoral, S.A. De C.V.	OPERADORA TRANSTUR SA DE CV C FLORESTA #10904, COL LAS VEREDAS SAN JOSE DEL CABO, BC 23435	48.73	0.00	0.00	0.00	48.73 USD	Yes	Insufficient documentation to support secured, priority claim
	Date Filed:	10/12/2020									
	Modified Claim	20040			0.00	0.00	0.00	48.73	48.73 USD	No	
8	20000	No	Aerovías De México, S.A. De C.V.	PAVILION PEDREGAL 24-601, COL MOLINO DEL REY MIGUEL HIDALGO, MX	88,122.31	0.00	88,122.31	88,122.31	88,122.31 USD	Yes	Insufficient documentation to support secured, priority claim
	Date Filed:	8/10/2020									
	Modified Claim	20000			0.00	0.00	0.00	88,122.31	88,122.31 USD	No	

Incorrectly Classified and Unliquidated Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
9	20358	No	Aerovías De México, S.A. De C.V.	SANDEL TURISMO EDUCATIVO S DE RL DE CV CASA DE LA MALINCHE 100 INT 2C RESIDENCIAL CASA BELLA	0.00	9,072.64	0.00	0.00	9,072.64 USD	Yes	Insufficient documentation to support secured, priority claim. No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	Date Filed: 1/14/2021										
	Modified Claim 20358				0.00	0.00	0.00	9,072.64	9,072.64 USD	No	
10	20337	No	Aerovías De México, S.A. De C.V.	SOTO, NANCY GOMEZ AV SANTA FE 596 108, SANTA FE MEXICO 05109	2,708.97	0.00	0.00	0.00	2,708.97 USD	Yes	Insufficient documentation to support secured claim
	Date Filed: 1/14/2021										
	Modified Claim 20337				0.00	0.00	0.00	2,708.97	2,708.97 USD	No	
11	20039	No	Aerolitoral, S.A. De C.V.	TRANSCABO SA DE CV C FLORESTA #10904 COL LAS VEREDAS SAN JOSÉ DEL CABO, 23435	254.42	0.00	0.00	0.00	254.42 USD	Yes	Insufficient documentation to support secured, priority claim
	Date Filed: 10/12/2020										
	Modified Claim 20039				0.00	0.00	0.00	254.42	254.42 USD	No	
12	20246	No	Aerovías De México, S.A. De C.V.	TRAVELLINK SA DE CV SALAMANCA NO 40 COL ROMA NORTE MEXICO MX 06700	953.91	0.00	0.00	0.00	953.91 USD	Yes	Insufficient documentation to support secured claim
	Date Filed: 1/12/2021										
	Modified Claim 20246				0.00	0.00	0.00	953.91	953.91 USD	No	
Incorrectly Classified and Unliquidated Total			Count	USD	12	236,269.30	9,072.64	223,363.04	88,122.31	380,054.81	

Incorrectly Classified and Wrong Debtor Claims

Ref	Claim #	Transferred	Wrong Debtor	Correct Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
1	10296	No	Grupo Aeroméxico, S.A.B. De C.V.		JAR NET INC 1968 N PORT CT GRAPEVINE, TX, 76051	0.00	0.00	61,675.00	102,525.00	164,200.00 USD	No	Insufficient documentation to support priority claim
Date Filed:	11/11/2020											
Modified Claim	10296			Aerovías De México, S.A. De C.V.		0.00	0.00	0.00	164,200.00	164,200.00 USD	No	
2	20433	No	Grupo Aeroméxico, S.A.B. De C.V.		TRAVEL SECURITY SA ISIDORA GOYENECHEA 3365 PISO 10 SANTIAGO 7550120	0.00	0.00	11,633.16	0.00	11,633.16 USD	No	Insufficient documentation to support priority claim
Date Filed:	1/15/2021											
Modified Claim	20433			Aerovías De México, S.A. De C.V.		0.00	0.00	0.00	11,633.16	11,633.16 USD	No	
Incorrectly Classified and Wrong Debtor Claim Totals			Count:	USD	2	0.00	0.00	73,308.16	102,525.00	175,833.16		

Schedule 4 to Proposed Order

No Liability Claims

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
1	20236	Grupo Aeroméxico, S.A.B. De C.V.	AEROPUERTO Y TERRENOS SA DE CV BOSQUES DE ALISOS 45-B PB CUAJIMALPA DE MORELOS 05120	0.00	0.00	0.00	0.00	0.00 USD	No	Not liability of debtor, claim is related to shareholder agreement for non debtor entity
	Date Filed:	1/12/2021								
2	134	Grupo Aeroméxico, S.A.B. De C.V.	BYRNE, JAKE PO BOX 615 HAYWARD, CA, 94543	0.00	0.00	0.00	500.00	500.00 USD	No	Amounts are not outstanding. Per backup attached to this Claim, this request was denied in 1998
	Date Filed:	11/23/2020								
3	133	Aerovías De México, S.A. De C.V.	BYRNE, JAKE PO BOX 615 HAYWARD, CA, 94543	0.00	0.00	0.00	500.00	500.00 USD	No	Amounts are not outstanding. Per backup attached to this Claim, this request was denied in 1998
	Date Filed:	11/23/2020								
4	132	Aerovías De México, S.A. De C.V.	BYRNE, JAKE PO BOX 615 HAYWARD, CA, 94543	0.00	0.00	0.00	500.00	500.00 USD	No	Amounts are not outstanding. Per backup attached to this Claim, this request was denied in 1998
	Date Filed:	11/23/2020								
5	131	Aerovías Empresa De Cargo, S.A. De C.V.	BYRNE, JAKE PO BOX 615 HAYWARD, CA, 94543	0.00	0.00	0.00	500.00	500.00 USD	No	Amounts are not outstanding. Per backup attached to this Claim, this request was denied in 1998
	Date Filed:	11/23/2020								
6	130	Aerolitoral, S.A. De C.V.	BYRNE, JAKE PO BOX 615 HAYWARD, CA, 94543	0.00	0.00	0.00	500.00	500.00 USD	No	Amounts are not outstanding. Per backup attached to this Claim, this request was denied in 1998
	Date Filed:	11/23/2020								
7	197	Grupo Aeroméxico, S.A.B. De C.V.	BYRNE, JAKE PO BOX 615 HAYWARD, CA, 94543	0.00	0.00	0.00	1,000.00	1,000.00 USD	No	Amounts are not outstanding. Per backup attached to this Claim, this request was denied in 1998
	Date Filed:	12/28/2020								
8	561023060	Aerovías De México, S.A. De C.V.	CENTRO NACIONAL DE METROLOGIA KM 4 5 CARRETERA A LOS CU?S MPO EL MARQUEZ QUERETARO, QUERETARO, 76241	0.00	0.00	0.00	487.32	487.32 USD	No	No services performed/charges incurred
	Date Filed:	Scheduled								

*Pursuant to ¶ 8(d), n.4 of the Order (I) Establishing Deadline for Filing Proofs of Claim and Procedures Relating Thereto and (II) Approving the Form and Manner of Notice Thereof [ECF No. 648] (the “Bar Date Order”), certain Claims that were originally denominated in Mexican pesos have been converted to United States dollars, based upon the conversion rate in place as of June 30, 2020 from Banco de Mexico (Central Bank).

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
9	20470	Grupo Aeroméxico, S.A.B. De C.V.	CHAVEZ, MIGUEL ANGEL VALERO MONROVIA 809 INTB403 PORTALES BENITO JUAREZ CDMX, DF 03300	0.00	0.00	0.00	13,442.20	13,442.20 USD	Yes	Claim is against non-debtor – AM FORMACION INTERNA S.A. de C.V.
	Date Filed:	1/15/2021								
10	10074	Grupo Aeroméxico, S.A.B. De C.V.	CODELMEX SA DE CV CERRADA ADELITA #28 CIUDAD DE MEXICO, 08100	0.00	626.74	626.74	0.00	626.74 USD	No	Claim is against non debtor - Administradora Especializada en Negocios, S.A. De D.V., further, upon information and belief, this Claim has been satisfied by a non-debtor
	Date Filed:	7/29/2020								
11	10129	Grupo Aeroméxico, S.A.B. De C.V.	FUENTES, KARLA PAOLA ZALDIVAR HUEXOTITLA #87 COL SAN PEDRO MARTIR CIUDAD DE MEXICO, 14650	0.00	0.00	0.00	367.24	367.24 USD	No	Claim is against non debtor - Administradora Especializada en Negocios, S.A. De D.V., further, upon information and belief, this Claim has been satisfied by a non-debtor
	Date Filed:	8/4/2020								
12	561057690	Aerovías De México, S.A. De C.V.	INSTITUTO NACIONAL DE INVESTIGACIONES NUCLEARES KM 36 5 CARRETERA MEXICO TOLUCA MEXICO OCOYOACAC, MEXICO, 52045	0.00	0.00	0.00	301.44	301.44 USD	No	No services performed/charges incurred
	Date Filed:	Scheduled								
	No Liability Claim Total	Count:	USD	12	0.00	626.74	626.74	18,098.20	18,724.94	

Schedule 5 to Proposed Order

Satisfied Claims

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
1	561000600	No	Aerovías De México, S.A. De C.V.	ADMINISTRACION DE AEROPUERTOS Y SERVICIOS AUXILIARES A LA NAVEGACION AEREA REYES ORTIZ N.74 ESQUINA FEDERICO SUAZO LA PAZ	0.00	0.00	0.00	1,002.32	1,002.32 USD	
	Date Filed:	Scheduled								
2	561001220	No	Aerovías De México, S.A. De C.V.	AERO PARTS MANAGEMENT LLC 8344 GREENBANK BLVD WINDERMERE, FL,	0.00	0.00	0.00	94,606.19	94,606.19 USD	
	Date Filed:	Scheduled								
3	565000180	No	Aerolitoral, S.A. De C.V.	AERO PARTS MANAGEMENT LLC 8344 GREENBANK BLVD WINDERMERE, FL, 34786	0.00	0.00	0.00	101,984.70	101,984.70 USD	
	Date Filed:	Scheduled								
4	565008230	No	Aerolitoral, S.A. De C.V.	AEROPUERTOS Y SERVICIOS AUXILIARES AV 602 NO 161 SAN JUAN DE ARAGON VENUSTIANO CARRANZA, CDMX, 15620	0.00	0.00	0.00	1,070,821.34	1,070,821.34 USD	
	Date Filed:	Scheduled								
5	561008690	No	Aerovías De México, S.A. De C.V.	AEROPUERTOS Y SERVICIOS AUXILIARES AV 602 NO 161 SAN JUAN DE ARAGON VENUSTIANO CARRANZA, CDMX, 15620	0.00	0.00	0.00	15,245,783.95	15,245,783.95 USD	
	Date Filed:	Scheduled								
6	566001590	No	Aerovías Empresa De Cargo, S.A. De C.V.	ARGO FOODS 73 COLONY AVENUE STATEN ISLAND NEW YORK, NW, 10305	0.00	0.00	0.00	1,718.00	1,718.00 USD	
	Date Filed:	Scheduled								
7	566001800	No	Aerovías Empresa De Cargo, S.A. De C.V.	AURORA FRESH SPR DE RL DE CV PLATEROS 85 EL MIRADOR MICHOACAN DE OCAMPO, MICHOACAN DE OCAMPO, 60010	0.00	0.00	0.00	3,952.00	3,952.00 USD	
	Date Filed:	Scheduled								
8	149	No	Grupo Aeroméxico, S.A.B. De C.V.	AZOCAR, ZAIRA S LLANCAN C/O LEBEDEV MICHAEL & HELMI PLC ATTN SAM HELMI; GENNADY LEVEDEV 10999 RIVERSIDE DR, STE 201 STUDIO CITY, CA, 91602	0.00	0.00	0.00	0.00	0.00 USD	Yes
	Date Filed:	12/10/2020								
9	10243	No	Aerovías De México, S.A. De C.V.	BODEGAS Y VINEDOS LA ESPERANZA SA TIL TIL 2228, MACUL SANTIAGO, , 7810130	0.00	1,310.40	0.00	0.00	1,310.40 USD	Yes
	Date Filed:	9/23/2020								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
10	566002330	No	Aerovías Empresa De Cargo, S.A. De C.V.	CH ROBINSON GLOBAL FORWARDING MEXICO SA DE CV AV EUGENIO GARZA LAGUERA 955 INT PISO 4 ZONA VALLE ORIENTE NORTE SAN PEDRO GARZA GARCIA, NUEVO LEON, 66266	0.00	0.00	0.00	588.00	588.00 USD	
	Date Filed:	Scheduled								
11	14817	No	Aerovías De México, S.A. De C.V.	COMMERCIAL AVIATION INTERNATIONAL 16033 N 77TH ST, STE C SCOTTSDALE, AZ 85260	0.00	0.00	0.00	349,410.43	349,410.43 USD	
	Date Filed:	3/12/2021								
12	10007	No	Aerovías De México, S.A. De C.V.	CONDOR INNOVATION & SOLUTIONS RUBIO RUIZ SAN FRANCISCO 606 INT 302, DEL VALLE BENITO JUAREZ, 03100	0.00	0.00	0.00	2,826,399.82	2,826,399.82 MXN	
	Date Filed:	7/15/2020								
13	561028660	No	Aerovías De México, S.A. De C.V.	CORTI MARCOS ALBERTO CORUÑA 161 PLANTA ALTA ALAMOS BENITO JUAREZ, CDMX, 3400	0.00	0.00	0.00	5,151.07	5,151.07 USD	
	Date Filed:	Scheduled								
14	566003620	No	Aerovías Empresa De Cargo, S.A. De C.V.	DEGOLLADO SAMANO EDUARDO ALFONSO CALZ. DE LOS FRESNOS 7322 CIUDAD GRANJA ZAPOPAN, JALISCO, 45010	0.00	0.00	0.00	1,484.67	1,484.67 USD	
	Date Filed:	Scheduled								
15	566004030	No	Aerovías Empresa De Cargo, S.A. De C.V.	DSV AIR & SEA INC 100 WALNUT AVENUE SUITE 405 CLARK, NJ, 7066	0.00	0.00	0.00	2,394.00	2,394.00 USD	
	Date Filed:	Scheduled								
16	14357	No	Grupo Aeroméxico, S.A.B. De C.V.	EUROCONTROL RUE DE LA FUSEE, 96 BRUXELLES 1130	0.00	0.00	0.00	581,022.74	581,022.74 USD	
	Date Filed:	1/15/2021								
17	561036930	No	Aerovías De México, S.A. De C.V.	EUROCONTROL RUE DE LA FUSEE 96 B BRUXELLES, BRUXELLES, 1130	0.00	0.00	0.00	1,225,045.11	1,225,045.11 USD	
	Date Filed:	Scheduled								
18	115	No	Grupo Aeroméxico, S.A.B. De C.V.	FARELOGIX INC 760 NW 107TH AVE, STE 300 MIAMI, FL, 33172	0.00	0.00	0.00	1,600,400.04	1,600,400.04 USD	
	Date Filed:	10/22/2020								
19	566004920	No	Aerovías Empresa De Cargo, S.A. De C.V.	GEODIS MEXICO SA DE CV AV INSURGENTES SUR N800 PISO 17 INSURGENTES SAN BORJA BENITO JUAREZ, CDMX, 3100	0.00	0.00	0.00	2,347.00	2,347.00 USD	
	Date Filed:	Scheduled								
20	566004970	No	Aerovías Empresa De Cargo, S.A. De C.V.	GLOBAL FLORAL SERVICES 912 E 12TH ST B160 LOS ANGELES, CA, 90021	0.00	0.00	0.00	224.00	224.00 USD	
	Date Filed:	Scheduled								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
21	14829	No	Aerovías Empresa De Cargo, S.A. De C.V.	GONET MEXICO SA DE CV BATALLON DE SAN PATRICIO 109 NUEVO LEON MX 66260	0.00	0.00	0.00	46,000.83	46,000.83 USD	Yes
	Date Filed:	3/26/2021								
22	14830	No	Aerolitoral, S.A. De C.V.	GONET MEXICO SA DE CV BATALLON DE SAN PATRICIO 109 NUEVO LEON MX 66260	0.00	0.00	0.00	29,442.20	29,442.20 USD	Yes
	Date Filed:	3/26/2021								
23	14831	No	Aerovías De México, S.A. De C.V.	GONET MEXICO SA DE CV BATALLON DE SAN PATRICIO 109 NUEVO LEON MX 66260	0.00	0.00	0.00	934,948.20	934,948.20 USD	Yes
	Date Filed:	3/26/2021								
24	561046220	No	Aerovías De México, S.A. De C.V.	GRU AIRPORT CONCESS AEROP GUARULHOS SA RODHELIO SMIDTSN ANDAR 6 SALA 308 SAO PAULO, SAO PAULO, 7190100	0.00	0.00	0.00	37,499.09	37,499.09 USD	
	Date Filed:	Scheduled								
25	566005480	No	Aerovías Empresa De Cargo, S.A. De C.V.	HELVETIA ASSURANCES SA 25 QUAI LAMANDE LE HAVRE, LE HAVRE, 76600	0.00	0.00	0.00	3,242.00	3,242.00 USD	
	Date Filed:	Scheduled								
26	566005590	No	Aerovías Empresa De Cargo, S.A. De C.V.	HURACAN SIN PELIGRO S DE RL DE CV AV BONAMPAK MANZANA 1 LOTE 1 EXT 1 INT PISO 5 SUITE 500 SM 6 QUINTANA ROO, QUINTANA ROO, 77500	0.00	0.00	0.00	1,366.52	1,366.52 USD	
	Date Filed:	Scheduled								
27	561056500	No	Aerovías De México, S.A. De C.V.	IMPACTOS FRECUENCIA Y COBERTURA EN MEDIOS SA DE CV SASSO FERRATO 61 ALFONSO XIII ALVARO OBREGON, CDMX, 1460	0.00	0.00	0.00	104,676.02	104,676.02 USD	
	Date Filed:	Scheduled								
28	566005880	No	Aerovías Empresa De Cargo, S.A. De C.V.	IMPORTCARGO MEXICO SA DE CV FEDERICO BAROCCI 129 JARDINES DE ORIENTE LEON, GUANAJUATO, 37257	0.00	0.00	0.00	267.00	267.00 USD	
	Date Filed:	Scheduled								
29	566006060	No	Aerovías Empresa De Cargo, S.A. De C.V.	INSTITUTO NACIONAL DE SEGUROS CONTIGUO PARQUE NACIONAL CENTRO SAN JOSE, COSTA RICA, 0	0.00	0.00	0.00	1,254.00	1,254.00 USD	
	Date Filed:	Scheduled								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
30	14119	No	Aerovías De México, S.A. De C.V.	IRON MOUNTAIN MEXICO S DE RL DE CV AVENIDA RODOLFO GAONA COL. LOMAS DE SOTELO NUM. 86 DEL. MIGUEL HIDALGO CIUDAD DE MÉXICO 11200	0.00	0.00	0.00	1,515,799.31	1,515,799.31 MXN	
	Date Filed:	1/14/2021								
31	20384	No	Aerolitoral, S.A. De C.V.	IRON MOUNTAIN MEXICO S DE RL DE CV AV. RODOLFO GAONA #86 LOMAS DE SOTELO, DEL. MIGUEL HIDALGO CIUDAD DE MÉXICO CM 11200	0.00	0.00	0.00	221,276.56	221,276.56 MXN	
	Date Filed:	1/14/2021								
32	561058630	No	Aerovías De México, S.A. De C.V.	ISI BUCEO INDUSTRIAL MEXICO SA DE CV VULCANO 56 SN ENSUEÑOS NAUCALPAN, ESTADO DE MEXICO, 54740	0.00	0.00	0.00	4,637.12	4,637.12 USD	
	Date Filed:	Scheduled								
33	20032	No	Grupo Aeroméxico, S.A.B. De C.V.	IT-SEEKERS SA DE CV AV UNIVERSIDAD 1001 P4 INT10 AGUASCALIENTES, AG, 20127	0.00	0.00	0.00	0.00	0.00 USD	
	Date Filed:	9/15/2020								
34	561059550	No	Aerovías De México, S.A. De C.V.	JDL INDUSTRIES MIAMI INC 9500 NW 12TH MIAMI, FL, 33172	0.00	0.00	0.00	40,835.00	40,835.00 USD	
	Date Filed:	Scheduled								
35	566006360	No	Aerovías Empresa De Cargo, S.A. De C.V.	JOY MULTIMODAL LOGISTICS SA DE CV ORIENTE 108 INT 2059 GABRIEL RAMOS MILLAN SECCION TLACOTAL CIUDAD DE MEXICO, CDMX, 8700	0.00	0.00	0.00	1,725.00	1,725.00 USD	
	Date Filed:	Scheduled								
36	561063430	No	Aerovías De México, S.A. De C.V.	KOUJIMACHI TAX OFFICE 1 1 15 KUDANMINAMI CHIYODA KU TOKYO CHIYODA -KU, TOKYO	0.00	0.00	0.00	114,643.03	114,643.03 USD	
	Date Filed:	Scheduled								
37	566006570	No	Aerovías Empresa De Cargo, S.A. De C.V.	KUEHNE + NAGEL SA DE CV AVENIDA PERIFERICO SUR 4118 3ER JARDINES DEL PEDREGAL MEXICO, CDMX, 1001	0.00	0.00	0.00	328.00	328.00 USD	
	Date Filed:	Scheduled								
38	561064090	No	Aerovías De México, S.A. De C.V.	LAATS SA 8 AVENIDA 15 52 ZONA 13 GUATEMALA, GUATEMALA,	0.00	0.00	0.00	85,739.25	85,739.25 USD	
	Date Filed:	Scheduled								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
39	561066560	No	Aerovías De México, S.A. De C.V.	MAHOLA AIRPORT SASU ROISSYPOLE 1 RUE DE LA HAYE TREMBLAY, TREMBLAY, 93290	0.00	0.00	0.00	67,255.89	67,255.89 USD	
	Date Filed:	Scheduled								
40	561066890	No	Aerovías De México, S.A. De C.V.	MARK SOLUTIONS SA DE CV PERIFERICO SUR N 3453 PISO 8 SAN JERONIMO LIDICE LA MAGDALENA CONTRERAS, CDMX 10200	0.00	0.00	0.00	290,115.43	290,115.43 USD	
	Date Filed:	Scheduled								
41	561071450	No	Aerovías De México, S.A. De C.V.	MIAMI TECHNOLOGY GROUP INC 1837 LIGHTHOUSE CT WESTON, FL, 33327	0.00	0.00	0.00	1,126,428.01	1,126,428.01 USD	
	Date Filed:	Scheduled								
42	561072020	No	Aerovías De México, S.A. De C.V.	MICROFORMAS SA DE CV AVIACION MILITAR 53 INDUSTRIAL PUERTO AEREO VENUSTIANO CARRANZA, CDMX, 15710	0.00	0.00	0.00	25,357.24	25,357.24 USD	
	Date Filed:	Scheduled								
43	561075320	No	Aerovías De México, S.A. De C.V.	NEVADA TOURS SA DE CV RICARDO PALMA 2744 LOMAS DE GUEVARA GUADALAJARA, JALISCO, 44657	0.00	0.00	0.00	28,716.75	28,716.75 USD	
	Date Filed:	Scheduled								
44	566007720	No	Aerovías Empresa De Cargo, S.A. De C.V.	NEXUS LOGISTICS SA AV KENNEDY 5757 OF 201 LAS CONDES, SANTIAGO DE CHILE	0.00	0.00	0.00	57.00	57.00 USD	
	Date Filed:	Scheduled								
45	561081410	No	Aerovías De Mexico, S.A. De C.V.	OXIGENO VC CAFETAL 426 GRANJAS MEXICO IZTACALCO, CDMX, 8400	0.00	0.00	0.00	70,656.59	70,656.59 USD	
	Date Filed:	Scheduled								
46	565021280	No	Aerolitoral, S.A.	OXIGENO VC CAFETAL 426 GRANJAS MEXICO IZTACALCO, CDMX, 8400	0.00	0.00	0.00	16,770.81	16,770.81 USD	
	Date Filed:	Scheduled								
47	20189	No	Grupo Aeroméxico, S.A.B. De C.V.	OXIGENO VC SA DE CV CAFETAL 426, COL GRANJAS MEXICO IZTACALCO DF 08400	0.00	0.00	0.00	1,039,039.17	1,039,039.17 MXN	
	Date Filed:	1/6/2021								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
48	566008120	No	Aerovías Empresa De Cargo, S.A. De C.V.	PANALPINA TRANSPORTES MUNDIALES SA DE CV UNO 129 PANTITLAN IZTACALCO, CDMX, 8100	0.00	0.00	0.00	563.00	563.00 USD	
	Date Filed:	Scheduled								
49	10501	No	Aerovías De México, S.A. De C.V.	PUBLICIDAD 4N SA DE CV ALFONSO REYES #15 LOCAL "A" HIPODROMO DE LA CONDESA CUAUHTEMOC CDMX, MX 06170	0.00	0.00	0.00	251,198.00	251,198.00 USD	
	Date Filed:	12/16/2020								
50	10586	No	Aerovías De México, S.A. De C.V.	RACKSPACE US INC 1 FANATICAL PL WINDCREST, TX, 78218	0.00	0.00	0.00	985,137.74	985,137.74 USD	
	Date Filed:	12/21/2020								
51	566008550	No	Aerovías Empresa De Cargo, S.A. De C.V.	RAGO FOOD DISTRIBUTORS 7121 SYCAMORE ST COMMERCE, CA, 90040	0.00	0.00	0.00	1,586.00	1,586.00 USD	
	Date Filed:	Scheduled								
52	566008980	No	Aerovías Empresa De Cargo, S.A. De C.V.	SCHENKER INTERNATIONAL SA DE CV PATRIOTISMO 201 PISO 3 SAN PEDRO DE LOS PINOS BENITO JUAREZ, CDMX, 3800	0.00	0.00	0.00	1,109.00	1,109.00 USD	
	Date Filed:	Scheduled								
53	565023130	No	Aerolitoral, S.A. De C.V.	SECRETARIA DE COMUNICACIONES Y TRANSPORTES BLVD ADOLFO LOPEZ MATEOS 1990 LOS ALPES TLACOPAC ALVARO OBREGON, CDMX, 1010	0.00	0.00	0.00	28,930.65	28,930.65 USD	
	Date Filed:	Scheduled								
54	561089950	No	Aerovías De México, S.A. De C.V.	SECRETARIA DE COMUNICACIONES Y TRANSPORTES BLVD ADOLFO LOPEZ MATEOS 1990 LOS ALPES TLACOPAC ALVARO OBREGON, CDMX, 1010	0.00	0.00	0.00	12,781.86	12,781.86 USD	
	Date Filed:	Scheduled								
55	566009370	No	Aerovías Empresa De Cargo, S.A. De C.V.	SERVICIOS ADUANALES CARGO DAMYT SC RETORNO BOSQUES BONN 6 BOSQUES DE ARAGON CDMX, ESTADO DE MEXICO, 57170	0.00	0.00	0.00	2,988.00	2,988.00 USD	
	Date Filed:	Scheduled								
56	566009390	No	Aerovías Empresa De Cargo, S.A. De C.V.	SIGA LOGISTICS S DE RL DE CV ARAGON SIN NUMERO INT 1 CUAUHTEMOC CUERNAVACA, MORELOS, 62950	0.00	0.00	0.00	5,592.00	5,592.00 USD	
	Date Filed:	Scheduled								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
57	561092430	No	Aerovías De México, S.A. De C.V.	SKY EXPRESS CO LTD 7F 5 7F 4 NO 220 SONGJIANG RD TAIPEI, TAIWAN	0.00	0.00	0.00	3,267.06	3,267.06 USD	
	Date Filed:	Scheduled								
58	13371	No	Aerovías De México, S.A. De C.V.	SKYTEAM AIRLINE ALLIANCE MANAGEMENT COOP AMSTERDAMSEWEG 55 BUILDING 700 FLOOR 3.3 AMSTELVEEN, 1182 GP	0.00	0.00	0.00	83,300.22	83,300.22 USD	
	Date Filed:	1/13/2021								
59	561094420	No	Aerovías De México, S.A. De C.V.	SPAZIO SRL VIA LUCULLO 3 ROMA RM, ROMA RM, 187	0.00	0.00	0.00	8,601.12	8,601.12 USD	
	Date Filed:	Scheduled								
60	566009770	No	Aerovías Empresa De Cargo, S.A. De C.V.	SUN BLOOM PRODUCE LTD 220 1771 ROBSON ST VANCOUVER, BC, V6G3B7	0.00	0.00	0.00	1,415.00	1,415.00 USD	
	Date Filed:	Scheduled								
61	11174	No	Aerovías De México, S.A. De C.V.	TITANLOG SERV AUX DE TRANSP AEREO LTDA RUA DR RAMOS DE AZEVEDO 159 4 ANDAR SALA 406 GUARULHOS SP 07012020	0.00	0.00	0.00	47,173.13	47,173.13 USD	
	Date Filed:	12/30/2020								
62	566010030	No	Aerovías Empresa De Cargo, S.A. De C.V.	TJ LOGISTICS SA DE CV JOSE GUADALUPE MONTENEGRO 2304 ARCOS VALLARTA GUADALAJARA, JALISCO, 44130	0.00	0.00	0.00	3,330.00	3,330.00 USD	
	Date Filed:	Scheduled								
63	561098390	No	Aerovías De México, S.A. De C.V.	UNICAL AVIATION INC 680 S LEMON AVENUE CITY OF INDUSTRY, CALIFORNIA, 91789	0.00	0.00	0.00	22,115.00	22,115.00 USD	
	Date Filed:	Scheduled								
64	565024880	No	Aerolitoral, S.A. De C.V.	UNICAL AVIATION INC 680 S LEMON AVENUE CITY OF INDUSTRY, CALIFORNIA, 91789	0.00	0.00	0.00	6,312.00	6,312.00 USD	
	Date Filed:	Scheduled								
Satisfied Claims Total			Count:	USD	60	0.00	1,310.40	0.00	24,785,296.29	24,786,606.69
				MXN	4	0.00	0.00	0.00	5,602,514.86	5,602,514.86

Schedule 6 to Proposed Order

- (a) Amended Claims**
- (b) Duplicate Claims**

Amended Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
1	578	Aerovías De México, S.A. De C.V.	NATIXIS, NEW YORK BRANCH ATTN JOVICA IVETIC; CHRISTOPHER KILEY 1251 AVENUE OF THE AMERICAS, 5TH FL NEW YORK, NY, 10020	0.00	0.00	0.00	82,064.10	82,064.10 USD	Yes
	Date Filed:	1/14/2021							
	Surviving Claim:	753	Aerovías De México, S.A. De C.V.	NATIXIS NEW YORK BRANCH ATTN JOVICA IVETIC & CHRISTOPHER KILEY 1251 AVE OF THE AMERICAS, 5TH FL NEW YORK, NY, 10020	0.00	0.00	0.00	336,656.18	336,656.18 USD
	Date Filed:	6/4/2021							
2	330	Aerovías De México, S.A. De C.V.	SMBC BANK INTL PLC AS SECURITY AGENT ATTN VERONICA IRLAM 99 QUEEN VICTORIA ST LONDON EC4V 4EH	0.00	0.00	0.00	122,386,855.36	122,386,855.36 USD	Yes
	Date Filed:	1/13/2021							
	Surviving Claim:	14875	Aerovías De México, S.A. De C.V.	SMBC BANK INTERNATIONAL PLC ATTN VERONICA IRLAM 99 QUEEN VICTORIA ST LONDON EC4V 4EH	0.00	0.00	0.00	8,643,406.41	8,643,406.41 USD
	Date Filed:	6/3/2021							
3	331	Aerovías De México, S.A. De C.V.	SUMITOMO MITSUI BANKING CORP BRUSSELS BRANCH AS FACILITY AGENT C/O SMBC BANK INTL PLC; VICTORIA IRLAM 99 QUEEN VICTORIA ST LONDON EC4V 4EH	0.00	0.00	0.00	122,386,855.36	122,386,855.36 USD	Yes
	Date Filed:	1/13/2021							
	Surviving Claim:	14873	Aerovías De México, S.A. De C.V.	SUMITOMO MITSUI BANKING CORP BRUSSELS C/O SMBC BANK INTERNATIONAL PLC ATTENTION VERONICA IRLAM 99 QUEEN VICTORIA STLONDON EC4V 4EH	0.00	0.00	0.00	8,493,347.79	8,493,347.79 USD
	Date Filed:	6/3/2021							
4	332	Aerovías De México, S.A. De C.V.	SUMITOMO MITSUI BANKING CORP BRUSSELS BR C/O BCMG; ATTN FRANCOISE BOUCHAT; NASRIN TALUKDER; NADINE BOUDART NEO BUILDING RUE MONTROYER 51 BOX 6 BRUSSELS 1000	0.00	0.00	0.00	8,097.77	8,097.77 EUR	
	Date Filed:	1/13/2021							
	Surviving Claim:	14874	Aerovías De México, S.A. De C.V.	SUMITOMO MITSUI BANKING CORP BRUSSELS ATTN BOOKING & CREDIT MANAGEMENT GROUP FRANCOISE BOUCHAT / NASRINTALUKDER NEO BUILDING, RUE MONTROYER 51, BOX 6 BRUSSELS 1000	0.00	0.00	0.00	19,181.12	19,181.12 USD
	Date Filed:	6/3/2021							
5	12007	Aerovías De México, S.A. De C.V.	TEI INC 1-5-12,SHIBA, MINATO-KU TOP HAMAMATSUCHO. BLDG. 7F TOKYO 105-0014	0.00	0.00	0.00	3,356.37	3,356.37 USD	
	Date Filed:	1/7/2021							
	Surviving Claim:	14885	Aerovías De México, S.A. De C.V.	TEI INC 1-5-12, SHIBA, MINATO-KU TOP HAMAMATSUCHO. BLDG. 7F TOKYO 105-0014	0.00	0.00	0.00	3,356.37	3,356.37 USD
	Date Filed:	7/20/2021							

Amended Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
6	214	Grupo Aeroméxico, S.A.B. De C.V.	TEXASWORLD SERVICE COMPANY INC D/B/A WORLD SERVICE COMPANY INC PO BOX 62225 HOUSTON, TX, 77205	0.00	0.00	0.00	5,386.33	5,386.33 USD	
	Date Filed:	12/31/2020							
	Surviving Claim:	14630	Aerovías De México, S.A. De C.V.	0.00	0.00	0.00	3,108.54	3,108.54 USD	
	Date Filed:	1/15/2021							
	Amended Claims Total	Count:	USD	5	0.00	0.00	0.00	244,864,517.52	244,864,517.52
			EUR	1	0.00	0.00	0.00	8,097.77	8,097.77

Duplicate Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated
1	13437	Grupo Aeroméxico, S.A.B. de C.V.	ALLIANCE GROUND INTERNATIONAL LLC C/O ROSS R HARTOG 101 NE THIRD AVE, STE 1210 FORT LAUDERDALE, FL 33301	0.00	0.00	0.00	65,634.92	65,634.92 USD	
Date Filed:	1/13/2021								
Surviving Claim:	10295	Aerovías Empresa De Cargo, S.A. De C.V.	ALLIANCE GROUND INTERNATIONAL LLC C/O ROSS R HARTOG 101 NE THIRD AVE, STE 1210 FORT LAUDERDALE, FL 33301	0.00	0.00	0.00	65,634.92	65,634.92 USD	
Date Filed:	11/10/2020								
2	13441	Aerolitoral, S.A. De C.V.	ALLIANCE GROUND INTERNATIONAL LLC C/O ROSS R HARTOG 101 NE THIRD AVE, STE 1210 FORT LAUDERDALE, FL 33301	0.00	0.00	0.00	65,634.92	65,634.92 USD	
Date Filed:	1/13/2021								
Surviving Claim:	10295	Aerovías Empresa De Cargo, S.A. De C.V.	ALLIANCE GROUND INTERNATIONAL LLC C/O ROSS R HARTOG 101 NE THIRD AVE, STE 1210 FORT LAUDERDALE, FL 33301	0.00	0.00	0.00	65,634.92	65,634.92 USD	
Date Filed:	11/10/2020								
3	709	Aerovías De México, S.A. De C.V.	AUTOCARS SKYPORT ATTN CATHERINE DE SMET2450 BOUL DES ENTERPRISES TERREBONNE, QC, J6X 4J8	0.00	0.00	0.00	4,612.85	4,612.85 USD	
Date Filed:	2/25/2021								
Surviving Claim:	14784	Aerovías De México, S.A. De C.V.	CANADA INC AUTOCARS SKYPORT 2450 BOUL DES ENTREPRISES TERREBONNE QUEBEC, QC, J6X 4J8	0.00	0.00	0.00	4,612.85	4,612.85 USD	
Date Filed:	2/19/2021								
4	13446	Grupo Aeroméxico, S.A.B. De C.V.	CARGO SECURITY COMPANY C/O ROSS R HARTOG 101 NE THIRD AVE, STE 1210 FORT LAUDERDALE, FL 33301	0.00	0.00	0.00	65,634.92	65,634.92 USD	
Date Filed:	1/13/2021								
Surviving Claim:	13453	Aerovías Empresa De Cargo, S.A. De C.V.	CARGO SECURITY COMPANY C/O ROSS R HARTOG 101 NE THIRD AVE, STE 1210 FORT LAUDERDALE, FL 33301	0.00	0.00	0.00	65,634.92	65,634.92 USD	
Date Filed:	1/13/2021								
5	13451	Aerolitoral, S.A. De C.V.	CARGO SECURITY COMPANY C/O ROSS R HARTOG 101 NE THIRD AVE, STE 1210 FORT LAUDERDALE, FL 33301	0.00	0.00	0.00	65,634.92	65,634.92 USD	
Date Filed:	1/13/2021								
Surviving Claim:	13453	Aerovías Empresa De Cargo, S.A. De C.V.	CARGO SECURITY COMPANY C/O ROSS R HARTOG 101 NE THIRD AVE, STE 1210 FORT LAUDERDALE, FL 33301	0.00	0.00	0.00	65,634.92	65,634.92 USD	
Date Filed:	1/13/2021								

*Pursuant to ¶ 8(d), n.4 of the Order (I) Establishing Deadline for Filing Proofs of Claim and Procedures Relating Thereto and (II) Approving the Form and Manner of Notice Thereof [ECF No. 648] (the “Bar Date Order”), certain Claims that were originally denominated in Mexican pesos have been converted to United States dollars, based upon the conversion rate in place as of June 30, 2020 from Banco de Mexico (Central Bank).

Duplicate Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated
6	20008	Aerolitoral, S.A. De C.V.	GRUPO LIENCA SA DE CV AVENIDA NUEVO LEON 202 INT PISO 9COL HIPODROMO ALCALDIA CUAUHTÉMOC CIUDAD DE MÉXICO, 06100	0.00	0.00	0.00	5,245.49	5,245.49 USD	Yes
Date Filed:	8/17/2020								
Surviving Claim:	68	Aerolitoral, S.A. De C.V.	GRUPO LIENCA SA DE CV 202 NUEVO LEON AVE MEXICO CITY	0.00	0.00	0.00	5,245.49	5,245.49 USD	
Date Filed:	8/20/2020								
7	20477	Aerolitoral, S.A. De C.V.	GRUPO LIENCA SA DE CV AVENIDA NUEVO LEON 2020 HIPODROMO DF 0610	0.00	0.00	0.00	5,245.49	5,245.49 USD	
Date Filed:	1/15/2021								
Surviving Claim:	68	Aerolitoral, S.A. De C.V.	GRUPO LIENCA SA DE CV 202 NUEVO LEON AVE MEXICO CITY	0.00	0.00	0.00	5,245.49	5,245.49 USD	
Date Filed:	8/20/2020								
8	10132	Aerovías De México, S.A. De C.V.	HOTEL COLON INTERNACIONAL CA AV AMAZONAS N19-14 Y AV PATRIA0 QUITO EC, 593	10,773.33	0.00	0.00	0.00	10,773.33 USD	
Date Filed:	8/7/2020								
Surviving Claim:	702	Aerovías De México, S.A. De C.V.	HOTEL COLON INTERNACIONALCA N 19-14 Y AV AMAZONAS Y PATRIA QUITO EC	10,773.33	0.00	0.00	0.00	10,773.33 USD	
Date Filed:	2/8/2021								
9	20	Grupo Aeroméxico, S.A.B. De C.V.	INTEGRADOR DE TI ACTIGLOBAL SA DE CV AV EJERCITO NACIONALNO 423 PISO 2 COL GRANADA MIGUEL HIDALGO CIUDAD DE MEXICO MX, 11520	0.00	0.00	0.00	30,668.08	30,668.08 USD	
Date Filed:	7/27/2020								
Surviving Claim:	14730	Aerovías De México, S.A. De C.V.	INTEGRADOR DE TI ACTIGLOBAL SA DE CV ATTN MIGUEL HIDALGO AV EJERCITO NACIONAL 423 INT 2 GRANADA CDMX 11520	0.00	0.00	0.00	30,668.08	30,668.08 USD	
Date Filed:	1/22/2021								
10	504	Aerovías De México, S.A. De C.V.	JACKSON SQUARE AVIATION IRELAND LIMITED C/O HOLLAND & KNIGHT LLPATTN BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	0.00	0.00 USD	
Date Filed:	1/14/2021								
Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD	
Date Filed:	6/2/2021								

Duplicate Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated
11	491	Aerovías De México, S.A. De C.V.	JACKSON SQUARE AVIATION LLC C/O HOLLAND & KNIGHT LLPATTN BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	0.00	0.00 USD	
Date Filed:	1/14/2021								
Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD	
Date Filed:	6/2/2021								
12	494	Aerovías De México, S.A. De C.V.	JACKSON SQUARE AVIATION LLC C/O HOLLAND & KNIGHT LLPATTN BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	0.00	0.00 USD	
Date Filed:	1/14/2021								
Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD	
Date Filed:	6/2/2021								
13	497	Aerovías De México, S.A. De C.V.	JACKSON SQUARE AVIATION LLC C/O HOLLAND & KNIGHT LLPATTN BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	0.00	0.00 USD	
Date Filed:	1/14/2021								
Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD	
Date Filed:	6/2/2021								
14	500	Aerovías De México, S.A. De C.V.	JACKSON SQUARE AVIATION LLC C/O HOLLAND & KNIGHT LLPATTN BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	0.00	0.00 USD	
Date Filed:	1/14/2021								
Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD	
Date Filed:	6/2/2021								

Duplicate Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated
15	503	Aerovías De México, S.A. De C.V.	JACKSON SQUARE AVIATION LLC C/O HOLLAND & KNIGHT LLPATTN BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	0.00	0.00 USD	
Date Filed:	1/14/2021								
Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD	
Date Filed:	6/2/2021								
16	506	Aerovías De México, S.A. De C.V.	JACKSON SQUARE AVIATION LLC C/O HOLLAND & KNIGHT LLPATTN BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	0.00	0.00 USD	
Date Filed:	1/14/2021								
Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD	
Date Filed:	6/2/2021								
17	509	Aerovías De México, S.A. De C.V.	JACKSON SQUARE AVIATION LLC C/O HOLLAND & KNIGHT LLPATTN BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	0.00	0.00 USD	
Date Filed:	1/14/2021								
Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD	
Date Filed:	6/2/2021								
18	511	Aerovías De México, S.A. De C.V.	JACKSON SQUARE AVIATION LLC C/O HOLLAND & KNIGHT LLPATTN BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	0.00	0.00 USD	
Date Filed:	1/14/2021								
Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD	
Date Filed:	6/2/2021								

Duplicate Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated
19	514	Aerovías De México, S.A. De C.V.	JACKSON SQUARE AVIATION LLC C/O HOLLAND & KNIGHT LLPATTN BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	0.00	0.00 USD	
Date Filed:	1/14/2021								
Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD	
Date Filed:	6/2/2021								
20	517	Aerovías De México, S.A. De C.V.	JACKSON SQUARE AVIATION LLC C/O HOLLAND & KNIGHT LLPATTN BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	0.00	0.00 USD	
Date Filed:	1/14/2021								
Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD	
Date Filed:	6/2/2021								
21	492	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLPATTN BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	0.00	0.00 USD	
Date Filed:	1/14/2021								
Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD	
Date Filed:	6/2/2021								
22	495	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLPATTN BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	0.00	0.00 USD	
Date Filed:	1/14/2021								
Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD	
Date Filed:	6/2/2021								

Duplicate Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated
23	498	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLPATTN BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	0.00	0.00 USD	
Date Filed:	1/14/2021								
Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD	
Date Filed:	6/2/2021								
24	501	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLPATTN BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	0.00	0.00 USD	
Date Filed:	1/14/2021								
Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD	
Date Filed:	6/2/2021								
25	507	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLPATTN BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	0.00	0.00 USD	
Date Filed:	1/14/2021								
Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD	
Date Filed:	6/2/2021								
26	512	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLPATTN BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	0.00	0.00 USD	
Date Filed:	1/14/2021								
Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD	
Date Filed:	6/2/2021								

Duplicate Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated
27	515	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLPATTN BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	0.00	0.00 USD	
Date Filed:	1/14/2021								
Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD	
Date Filed:	6/2/2021								
28	518	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLPATTN BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	0.00	0.00 USD	
Date Filed:	1/14/2021								
Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD	
Date Filed:	6/2/2021								
29	668	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLPATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	0.00	0.00 USD	
Date Filed:	1/14/2021								
Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD	
Date Filed:	6/2/2021								
30	11791	Aerovías De México, S.A. De C.V.	RDIT DE MEXICO S DE RL DE CV HEGEL 228 PISO 6 MIGUEL HIDALGO CIUDAD DE MEXICO, 11570	0.00	0.00	0.00	14,297.30	14,297.30 USD	
Date Filed:	1/5/2021								
Surviving Claim:	147	Aerovías De México, S.A. De C.V.	RDIT DE MEXICO S DE RL DE CV 228 HEGEL CIUDAD DE MEXICO 11570	0.00	0.00	0.00	14,297.30	14,297.30 USD	
Date Filed:	12/14/2020								
31	263	Aerovías De México, S.A. De C.V.	RESIDENCE INN BY MARRIOTT GRAPEVINE, TX 2020 STATE HWY 260 GRAPEVINE, TX, 76051	0.00	0.00	0.00	30,004.89	30,004.89 USD	
Date Filed:	1/11/2021								
Surviving Claim:	37	Aerovías De México, S.A. De C.V.	MOODY NATIONAL RI GRAPEVINE MT LLC C/O RESIDENCE INN BY MARRIOTT 2020 STATE HWY 26 GRAPEVINE, TX, 76051	0.00	0.00	0.00	30,004.89	30,004.89 USD	
Date Filed:	8/3/2020								

Duplicate Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated
32	684	Grupo Aeroméxico, S.A.B. De C.V.	TEXASWORLD SERVICE COMPANY INC D/B/A WORLD SERVICE COMPANY INCPO BOX 62225 HOUSTON, TX, 77205	0.00	0.00	0.00	5,386.33	5,386.33 USD	
	Date Filed:	12/15/2020							
	Surviving Claim:	214	Grupo Aeroméxico, S.A.B. De C.V.	TEXASWORLD SERVICE COMPANY INC D/B/A WORLD SERVICE COMPANY INC PO BOX 62225 HOUSTON, TX, 77205	0.00	0.00	0.00	5,386.33	5,386.33 USD
	Date Filed:	12/31/2020							
33	14457	Aerolitoral, S.A. De C.V.	WAYNE COUNTY AIRPORT AUTHORITY C/O MILLER CANFIELDATTN MARC SWANSON 150 W JEFFERSON, STE 2500 DETROIT, MI, 48226	0.00	0.00	0.00	97,165.93	97,165.93 USD	
	Date Filed:	1/15/2021							
	Surviving Claim:	13026	Aerovías De México, S.A. De C.V.	WAYNE COUNTY AIRPORT AUTHORITY C/O MILLER CANFIELD ATTN MARC SWANSON 150 W JEFFERSON, STE 2500 DETROIT, MI, 48226	0.00	0.00	0.00	137,268.41	137,268.41 USD
	Date Filed:	1/12/2021							
34	493	Aerovías De México, S.A. De C.V.	WELLS FARGO TRUST COMPANY NA, OWNER TTEE TRUST AGREEMENT (36699) DTD 12/10/2013C/O HOLLAND & KNIGHT LLP; BARBRA PARLIN 31 W 52ND ST, NEW YORK, NY, 10019	12,347,372.37	0.00	0.00	0.00	12,347,372.37 USD	Yes
	Date Filed:	1/14/2021							
	Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST, NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD
	Date Filed:	6/2/2021							
35	496	Aerovías De México, S.A. De C.V.	WELLS FARGO TRUST COMPANY NA, OWNER TTEE AMENDED & RESTATED TRUST DTD 10/30/2014C/O HOLLAND & KNIGHT LLP; BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10019	13,429,786.37	0.00	0.00	0.00	13,429,786.37 USD	Yes
	Date Filed:	1/14/2021							
	Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST, NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD
	Date Filed:	6/2/2021							
36	499	Aerovías De México, S.A. De C.V.	WELLS FARGO TRUST COMPANY NA, OWNER TTEE AMENDED & RESTATED TRUST DTD 12/3/2014C/O HOLLAND & KNIGHT LLP; BARBRA PARLIN 31 W 52ND ST, NEW YORK, NY, 10019	13,272,110.37	0.00	0.00	0.00	13,272,110.37 USD	Yes
	Date Filed:	1/14/2021							
	Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST, NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD
	Date Filed:	6/2/2021							

Duplicate Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated
37	502	Aerovías De México, S.A. De C.V.	WELLS FARGO TRUST COMPANY NA, OWNER TTEE TRUST AGREEMENT (36880) DTD 7/8/2016C/O HOLLAND & KNIGHT; BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10091	8,697,346.37	0.00	0.00	0.00	8,697,346.37 USD	Yes
	Date Filed:	1/14/2021							
	Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD
	Date Filed:	6/2/2021							
38	505	Aerovías De México, S.A. De C.V.	WELLS FARGO TRUST COMPANY NA, OWNER TTEE TRUST AGREEMENT (37753) DTD 5/11/2016C/O HOLLAND & KNIGHT LLP; BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10019	8,850,184.37	0.00	0.00	0.00	8,850,184.37 USD	Yes
	Date Filed:	1/14/2021							
	Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD
	Date Filed:	6/2/2021							
39	508	Aerovías De México, S.A. De C.V.	WELLS FARGO TRUST COMPANY NA, OWNER TTEE TRUST AGREEMENT (43704) DTD 8/4/2017C/O HOLLAND & KNIGHTLLP; BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10019	5,625,980.37	0.00	0.00	0.00	5,625,980.37 USD	Yes
	Date Filed:	1/14/2021							
	Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD
	Date Filed:	6/2/2021							
40	510	Aerovías De México, S.A. De C.V.	WELLS FARGO TRUST COMPANY NA, OWNER TTEE TRUST AGREEMENT (43712) DTD 8/4/2017C/O HOLLAND & KNIGHT LLP; BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10019	23,519,049.20	0.00	0.00	0.00	23,519,049.20 USD	Yes
	Date Filed:	1/14/2021							
	Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD
	Date Filed:	6/2/2021							

Duplicate Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	
41	513	Aerovías De México, S.A. De C.V.	WELLS FARGO TRUST COMPANY NA, OWNER TTEE TRUST AGREEMENT (43756) DTD 8/4/2017C/O HOLLAND & KNIGHT LLP; BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10019	23,406,727.30	0.00	0.00	0.00	23,406,727.30 USD	Yes	
Date Filed:	1/14/2021									
Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD		
Date Filed:	6/2/2021									
42	516	Aerovías De México, S.A. De C.V.	WELLS FARGO TRUST COMPANY NA, OWNER TTEE TRUST AGREEMENT (43762) DTD 8/4/2017C/O HOLLAND & KNIGHT LLP; BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10019	24,125,424.80	0.00	0.00	0.00	24,125,424.80 USD	Yes	
Date Filed:	1/14/2021									
Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD		
Date Filed:	6/2/2021									
43	519	Aerovías De México, S.A. De C.V.	WELLS FARGO TRUST COMPANY NA, OWNER TTEE TRUST AAGREEMENT (43763) DTD 8/4/2017C/O HOLLAND & KNIGHT LLP; BARBRA PARLIN 31 W 52ND ST NEW YORK, NY, 10019	24,186,469.30	0.00	0.00	0.00	24,186,469.30 USD	Yes	
Date Filed:	1/14/2021									
Surviving Claim:	752	Aerovías De México, S.A. De C.V.	JSA INTERNATIONAL US HOLDINGS LLC C/O HOLLAND & KNIGHT LLP ATTN BARBRA R PARLIN, ESQ 31 W 52ND ST NEW YORK, NY, 10019	0.00	0.00	0.00	95,000,000.00	95,000,000.00 USD		
Date Filed:	6/2/2021									
Duplicate Claims Count:				USD	43	157,471,224.15	0.00	0.00	455,166.04	157,926,390.19
Totals										

Schedule 7 to Proposed Order

- (a) Reduced Claims**
- (b) Reduced and Incorrectly Classified Claims**

Reduced Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Reason
1	561020680	No	Aerovías De México, S.A. De C.V.	BRAINTIVITY SA DE CV PULTICUB 17 MZ 14 LT 28 SUPERMANZANA 24 CANCUN QROO, QUINTANA ROO, 77509	0.00	0.00	0.00	301,437.60	301,437.60 USD	Claim has been partially paid
	Date Filed:	Scheduled								
	Reduced Claim	561020680			0.00	0.00	0.00	50,239.72	50,239.72 USD	
2	561024810	No	Aerovías De México, S.A. De C.V.	CITY OF LOS ANGELES LAWA P.O. BOX 54078 LOS ANGELES, CA, 90054-0078	0.00	0.00	0.00	367,897.21	367,897.21 USD	Schedule is reduced by pre-petition credit memos
	Date Filed:	Scheduled								
	Reduced Claim	561024810			0.00	0.00	0.00	260,882.82	260,882.82 USD	
3	561033570	No	Aerovías De México, S.A. De C.V.	ECASA RANCHO BOYEROS KM 15 12 RANCHO BOYEROS HABANA	0.00	0.00	0.00	221,258.71	221,258.71 USD	Claim has been partially paid
	Date Filed:	Scheduled								
	Reduced Claim	561033570			0.00	0.00	0.00	136,922.71	136,922.71 USD	
4	41	No	Aerovías De México, S.A. De C.V.	INTERNATIONAL SEWING COMPANY SA DE CV ELISA NO 34-A COL MARIA DEL CARMEN BENITO JUAREZ CDMX, 03540	0.00	0.00	0.00	349,304.10	349,304.10 USD	Reduced by critical vendor payments
	Date Filed:	8/5/2020								
	Reduced Claim	41			0.00	0.00	0.00	201,745.41	201,745.41 USD	
5	566007840	No	Aerovías Empresa De Cargo, S.A. De C.V.	ODOM SA DE CV CATEDRAL METROPOLITANA 38 METROPOLITANA 1A SECC NEZAHUALCOYOTL, MEXICO 57730	0.00	0.00	0.00	18,160.98	18,160.98 USD	Reduced by critical vendor payments
	Date Filed:	Scheduled								
	Reduced Claim	566007840			0.00	0.00	0.00	8,902.83	8,902.83 USD	
6	561076630	No	Aerovías De México, S.A. De C.V.	ODOM SA DE CV CATEDRAL METROPOLITANA 38 METROPOLITANA 1A SECC NEZAHUALCOYOTL, MEXICO 57730	0.00	0.00	0.00	326,862.93	326,862.93 USD	Reduced by critical vendor payments
	Date Filed:	Scheduled								
	Reduced Claim	561076630			0.00	0.00	0.00	239,710.67	239,710.67 USD	
7	561081250	No	Aerovías De México, S.A. De C.V.	ORION SOPORTE Y SERVICIOS COMPLEMENTARIOS DE AVIACION SA DE CV MATILDE MARQUEZ NO 61J INT01 PEÑON DE LOS BAÑOS VENUSTIANO CARRANZA, DISTRITO FEDERAL, 15520	0.00	0.00	0.00	147,636.47	147,636.47 USD	Reduced by critical vendor payments
	Date Filed:	Scheduled								
	Reduced Claim	561081250			0.00	0.00	0.00	65,942.03	65,942.03 USD	

Reduced Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Reason
8	561098250	No	Aerovías De México, S.A. De C.V.	TV AZTECA SAB DE CV PERIFERICO SUR 4121 FUENTES DEL PEDREGAL TLALPAN, CDMX, 14140	0.00	0.00	0.00	502,396.00	502,396.00	Portion of the schedule related to post-petition which has been paid
Date Filed:	Scheduled									
Reduced Claim	561098250				0.00	0.00	0.00	65,827.28	65,827.28 USD	
Reduced Claim Totals			Count:	USD	8	0.00	0.00	0.00	2,234,954.01	2,234,954.01

Reduced and Incorrectly Classified Claim

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
1	14129	No	Aerovías De México, S.A. De C.V.	AIRPORT TERMINAL MANAGEMENT INC ATTN ILIANA THOMAS 216 W FLORENCE AVE INGLEWOOD, CA, 90301	0.00	4,171.35	0.00	45,244.19	49,415.54 USD	Yes	Claim includes invoices that have been paid, the remaining invoices are for pre-petition services and do not qualify for administrative status. Per company's books and records USD 34,645.16 is outstanding
	Date Filed: 1/14/2021										
	Modified Claim				0.00	0.00	0.00	34,645.16	34,645.16 USD	No	

Reduced and Incorrectly Classified Claim Total	Count:	USD	1	0.00	4,171.35	0.00	45,244.19	49,415.54
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Schedule 8 to Proposed Order

Foreign Currency Claims

Foreign Currency Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
1	14379	No	Aerovías De México, S.A. De C.V.	ADVANTAGE TRAVEL CENTRES 21 PROVOST STREET HOXTON LONDON N1 7NH	0.00	0.00	0.00	9,191.01	9,191.01 GBP	No
	Date Filed:	1/15/2021								
	Modified Claim	14379			0.00	0.00	0.00	11,277.82	11,277.82 USD	No
2	14767	No	Aerovías De México, S.A. De C.V.	HOTELERA CORDILLERA LUZ SPA CALLE LUZ 2920 LAS CONDES SANTIAGO RM 7550024	0.00	0.00	0.00	32,860,601.00	32,860,601.00 CLP	No
	Date Filed:	2/4/2021								
	Modified Claim	14767			0.00	0.00	0.00	39,946.05	39,946.05 USD	No
3	11940	No	Aerovías De México, S.A. De C.V.	JACQUART & ASSOCIES DISTRIBUTION C/O COFACE NORTH AMERICA INSURANCE CO 650 COLLEGE RD E, STE 2005 PRINCETON, NJ, 08540	0.00	0.00	0.00	43,747.20	43,747.20 EUR	No
	Date Filed:	1/6/2021								
	Modified Claim	11940			0.00	0.00	0.00	49,036.24	49,036.24 USD	No
4	20417	No	Aerovías De México, S.A. De C.V.	SKYTEAM AGENCIAS DE VIAGENS E TURISMO RUA GENERAL CAMARA PORTO ALEGRE RS 90010230	0.00	0.00	0.00	9,764.88	9,764.88 BRL	Yes
	Date Filed:	1/15/2021								
	Modified Claim	20417			0.00	0.00	0.00	1,804.69	1,804.69 USD	No

Foreign Currency Claim Totals**Count:****GBP**
CLP
EUR
BRL**1**
1
1
1**0.00**
0.00
0.00
0.00**0.00**
0.00
0.00
0.00**0.00**
0.00
0.00
0.00**9,191.01**
32,860,601.00
43,747.20
9,764.88**9,191.01**
32,860,601.00
43,747.20
9,764.88

Exhibit 2 to Objection

Sánchez Declaration

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**GRUPO AEROMÉXICO, S.A.B. de C.V., et al.,
Debtors.¹**

Chapter 11

Case No. 20-11563 (SCC)

(Jointly Administered)

**DECLARATION OF RICARDO JAVIER SÁNCHEZ BAKER IN SUPPORT OF THE
DEBTORS' SEVENTEENTH OMNIBUS CLAIMS OBJECTION TO PROOFS OF
CLAIM (MISCLASSIFIED UNLIQUIDATED, WRONG DEBTOR, INCORRECTLY
CLASSIFIED, NO LIABILITY, SATISFIED, AMENDED, DUPLICATE, REDUCED,
AND/OR FOREIGN CURRENCY CLAIMS)**

I, Ricardo Javier Sánchez Baker, hereby declare that the following is true to the best of my knowledge, information and belief:

Background

1. I am the Chief Financial Officer of Grupo Aeroméxico, S.A.B. de C.V. (“**Grupo Aeroméxico**”), and its affiliates that are debtors and debtors in possession in these proceedings (collectively, the “**Debtors**,” the Debtors collectively with their direct and indirect non-Debtor subsidiaries, the “**Company**”). I have held several other positions at the Company since 2006, including serving as advisor to the Chief Executive Officer and Director of Revenue Management. I have been the chairman of the board of directors of the SABRE Corporation, a member of the SEAT Technical Committee, and a member of the Aeromexpress, CECAM, and PLM boards of directors. I have held various positions within the Federal Public Administration (*Administración Pública Federal*), including deputy director general of public debt for the Ministry of Finance and Public

¹ The Debtors in these cases, along with each Debtor’s registration number in the applicable jurisdiction, are as follows: Grupo Aeroméxico, S.A.B. de C.V. 286676; Aerovías de México, S.A. de C.V. 108984; Aerolitoral, S.A. de C.V. 217315; and Aerovías Empresa de Cargo, S.A. de C.V. 437094-1. The Debtors’ corporate headquarters is located at Paseo de la Reforma No. 243, piso 25 Colonia Cuauhtémoc, Mexico City, C.P. 06500.

Credit in 2003 and 2005. I hold a bachelor's degree in economics from the Universidad Iberoamericana, a diploma in finance from Instituto Tecnológico Autónomo de México, and master's and doctorate degrees in economics from the University of California, Los Angeles. I am familiar with the day-to-day operations, business, and financial affairs of the Debtors.

2. I submitted the *Declaration of Ricardo Javier Sánchez Baker in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings* [ECF No. 20] (the "**Sánchez First Day Declaration**"). I make this declaration (the "**Declaration**") in support of the *Seventeenth Omnibus Claims Objection to Proofs of Claim (Misclassified Unliquidated, Wrong Debtor, Incorrectly Classified, No Liability, Satisfied, Amended, Duplicate, Reduced, and Foreign Currency Claims)* (the "**Objection**"). I have reviewed the Objection or have otherwise had its contents explained to me, and the Objection is, to the best of my knowledge, accurate.

3. Except as otherwise indicated, all facts set forth in the Objection and this Declaration are based upon my personal knowledge, my review of relevant documents, information provided to me by employees working under my supervision, or my opinion based upon experience, knowledge, and information concerning the operations of the Debtors and the aviation industry as a whole. If I were called upon to testify, I could and would testify to each of the facts set forth herein.

4. I am generally familiar with the Debtors' day-to-day operations, financing arrangements, business affairs, and Books and Records² that reflect, among other things, the Debtors' liabilities, and the amount thereof owed to their creditors as of the Petition Date. I have read the Objection and corresponding Proposed Order, each filed contemporaneously herewith.

5. To the best of my knowledge, information, and belief, the assertions made in the Objection are accurate. In evaluating the Claims, the Debtors and other reviewing parties have

² Each capitalized term used herein but not otherwise defined herein shall have the meaning ascribed to it in the Objection.

reviewed the Debtors' Books and Records, the relevant Proofs of Claim, as well as the supporting documentation provided by the claimants, and determined that the: (i) Misclassified Unliquidated Claims; (ii) Wrong Debtor Claims; (iii) Incorrectly Classified Claims; (iv) No Liability Claims; (v) Satisfied Claims; (vi) Amended Claims; (vii) Duplicate Claims; (viii) Reduced Claims; and/or (ix) Foreign Currency Claims should be disallowed, expunged, modified, reduced, reclassified, or otherwise treated as set forth in the Objection and Proposed Order, and I concur with this determination.

Misclassified Unliquidated Claims

6. To the best of my knowledge, information, and belief, based on the Debtors' review of the Claims Register, the Books and Records, and each Misclassified Unliquidated Claim, the Debtors have determined that such Claims incorrectly indicate that all or a portion thereof are unliquidated. If the Misclassified Unliquidated Claims are not modified, the claimants identified on Schedules 1, 2(b), and 3(b) may improperly receive recoveries on account of the Claim at the expense of the Debtors and other creditors. Accordingly, I believe it is proper for the Court to enter the Proposed Order modifying the Misclassified Unliquidated Claims as set forth therein and in the Objection.

Wrong Debtor Claims

7. To the best of my knowledge, information, and belief, based on the Debtors' review of the Claims Register, the Books and Records, and each Wrong Debtor Claim, the Debtors have determined that each Wrong Debtor Claim has been filed against an incorrect Debtor. If the Wrong Debtor Claims are not modified, the claimants identified on Schedules 2 and 3(c) may improperly receive recoveries on a Claim against the incorrect Debtor. Accordingly, I believe it is proper for the

Court to enter the Proposed Order modifying the Wrong Debtor Claims as set forth therein and in the Objection.

Incorrectly Classified Claims

8. To the best of my knowledge, information, and belief, based on the Debtors' review of the Claims Register, the Books and Records, and each Incorrectly Classified Claim, the Debtors have determined that the claimant for each of these Claims is, in part or in full, not entitled to the asserted status or other priority identified in the Claim. If the Incorrectly Classified Claims are not properly reclassified, the claimants identified on Schedules 3 and 7(b) may improperly receive recoveries on account of the Claim at the expense of the Debtors and other creditors. Accordingly, I believe it is proper for the Court to enter the Proposed Order reclassifying the Incorrectly Classified Claims as set forth therein and in the Objection.

No Liability Claims

9. To the best of my knowledge, information, and belief, based on the Debtors' review of the Claims Register, the Books and Records, and each No Liability Claim, the Debtors have determined that such Claims seek to recover amounts for which the Debtors are not liable. If the No Liability Claims are not disallowed and expunged, the claimants identified on Schedule 4 may improperly receive recoveries on account of the Claim at the expense of the Debtors and other creditors. Accordingly, I believe it is proper for the Court to enter the Proposed Order disallowing and expunging the No Liability Claims as set forth therein and in the Objection.

Satisfied Claims

10. To the best of my knowledge, information, and belief, based on the Debtors' review of the Claims Register, the Books and Records, and each Satisfied Claim, the Debtors have determined that the Satisfied Claims have been paid and/or otherwise satisfied. If the Satisfied

Claims are not disallowed and expunged, the claimants identified on Schedule 5 may obtain double recovery from the same alleged liability, at the expense of the Debtors and other creditors. Accordingly, I believe it is proper for the Court to enter the Proposed Order disallowing and expunging the Satisfied Claims as set forth therein and in the Objection.

Amended and Duplicate Claims

11. To the best of my knowledge, information, and belief, based on the Debtors' review of the Claims Register, the Books and Records, and each Amended and Duplicate Claim, the Debtors have determined that (i) the Amended Claims set forth on Schedule 6(a) have been amended or superseded by other Claims filed by or on behalf of the same claimants relating to the same purported liabilities and (ii) the Duplicate Claims set forth on Schedule 6(b) are duplicative of other Claims filed by or on behalf of the same claimant relating to the same purported liability.

12. Furthermore, for each Amended and Duplicate Claim, the Debtors have identified a Surviving Claim that asserts the same liability and is identified on Schedule 6 in the applicable row labeled "Surviving Claim."

13. If the Amended and Duplicate Claims identified on Schedule 6 are not disallowed, the claimants identified therein may obtain double recovery from the same alleged liability, at the expense of the Debtors and other creditors. Accordingly, I believe it is proper for the Court to enter the Proposed Order disallowing and expunging the Amended and Duplicate Claims as set forth therein and in the Objection.

Reduced Claims

14. To the best of my knowledge, information, and belief, based on the Debtors' review of the Claims Register, the Books and Records, and each Reduced Claim, the Debtors have determined that each Reduced Claim (i) seeks to recover amounts in excess of what is reflected on

the Debtors' Books and Records and/or (ii) was filed with insufficient documentation to support the asserted Claim amount. If the Reduced Claims are not reduced and/or modified as set forth on Schedule 7, the claimants identified therein may obtain recoveries in excess of what they are entitled at the expense of the Debtors and other creditors. Accordingly, I believe it is proper for the Court to enter the Proposed Order reducing and/or modifying the Reduced Claims as set forth therein and in the Objection.

Foreign Currency Claims

15. To the best of my knowledge, information, and belief, based on the Debtors' review of the Claims Register and each Foreign Currency Claim, the Debtors have determined that the Foreign Currency Claims have each been asserted in a currency other than United States dollars or Mexican pesos. If the Foreign Currency Claims identified on Schedule 8 are not converted to United States dollars, the Claims Register will not reflect the proper amounts for such Claims. Accordingly, I believe it is proper for the Court to enter the Proposed Order modifying the Foreign Currency Claims as set forth therein and in the Objection.

Conclusion

16. I am authorized to submit this Declaration on behalf of the Debtors. In my opinion, and for the reasons set forth in this Declaration and in the Objection, (a) modifying, reducing, and/or reclassifying the Misclassified Unliquidated, Wrong Debtor, Incorrectly Classified, Reduced, and Foreign Currency Claims and (b) disallowing and/or expunging the No Liability, Satisfied, and Amended and Duplicate Claims, is in the best interest of the Debtors' estates.

17. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct.

Executed: August 18, 2021

By: /s/ Ricardo Javier Sánchez Baker
Ricardo Javier Sánchez Baker
Chief Financial Officer

Exhibit B

Omnibus Claims Hearing Procedures

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**GRUPO AEROMÉXICO, S.A.B. de C.V., et al.,
Debtors.¹**

Chapter 11

Case No. 20-11563 (SCC)

(Jointly Administered)

COURT-ORDERED OMNIBUS CLAIMS HEARING PROCEDURES

The Omnibus Claims Hearing Procedures (the “**Omnibus Claims Hearing Procedures**”) described herein have been ordered by the United States Bankruptcy Court for the Southern District of New York (the “**Court**”) to apply to the chapter 11 cases of Grupo Aeroméxico, S.A.B. de C.V. and its affiliated debtors.

Omnibus Claims Hearing Procedures

1. Pursuant to the Order Establishing Certain Notice, Case Management, and Administrative Procedures, entered on July 8, 2020 [ECF No. 79] (the “**Case Management Order**”), the Court established periodic omnibus hearings (the “**Omnibus Hearings**”) in these cases. The Debtors shall schedule the return date for claims objections, omnibus or otherwise, for hearing at Omnibus Hearings or other hearings the Debtors may schedule with the Court.

2. The Court may enter an order at the scheduled hearing sustaining an objection to proofs of claim (each, a “**Proof of Claim**”) with respect to which no response (a “**Response**”)² is

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Grupo Aeroméxico, S.A.B. de C.V. 286676; Aerovías de México, S.A. de C.V. 108984; Aerolitoral, S.A. de C.V. 217315; and Aerovías Empresa de Cargo, S.A. de C.V. 437094-1. The Debtors’ corporate headquarters is located at Paseo de la Reforma No. 243, piso 25 Colonia Cuauhtémoc, Mexico City, C.P. 06500.

² Any information submitted in connection with a Proof of Claim shall be part of the record with respect to the relevant Claim, and any such information already submitted need not be resubmitted in connection with the Omnibus Claims Hearing Procedures.

properly filed and served or pursuant to a certificate of no objection in accordance with the Case Management Order.

3. The hearing to consider an objection to Proofs of Claim as to which a Response is properly filed and served (each, a “**Contested Claim**”) shall be set for a contested hearing (each, an “**Omnibus Claims Hearing**”) to be scheduled by the Debtors, in their discretion, as set forth herein.

4. The Debtors shall schedule an Omnibus Claims Hearing for a Contested Claim as follows:

- A. For a non-evidentiary hearing to address whether the Contested Claim has failed to state a claim against the Debtors that can be allowed and should be dismissed pursuant to Bankruptcy Rule 7012 (a “**Sufficiency Hearing**”), unless the Debtors serve the claimant with a Notice of Merits Hearing (as defined herein), the Sufficiency Hearing shall go forward at the return date set in accordance with paragraph 1 of these Omnibus Claims Hearing Procedures. The legal standard of review that will be applied by the Court at a Sufficiency Hearing will be equivalent to the standard applied by the Court upon a motion to dismiss for failure to state a claim upon which relief can be granted.
- B. For an evidentiary hearing on the merits of a Contested Claim (a “**Merits Hearing**”), the Debtors may, in their discretion, serve upon the relevant claimant, by email or overnight delivery, with a copy to the Official Committee of Unsecured Creditors, Apollo Management Holdings, L.P., and the Ad Hoc Group of Senior Noteholders,³ and file with the Court, a notice substantially in the form attached to the Claims Objections Procedures Order as **Exhibit 2** (a “**Notice of Merits Hearing**”) at least thirty (30) calendar days prior to the date of such Merits Hearing. The rules and procedures applicable to such Merits Hearing will be set forth in a scheduling order issued by the Court in connection therewith.

5. Discovery with respect to a Contested Claim will not be permitted until either (a) the Court has held a Sufficiency Hearing and determined that the Contested Claim states a claim that could be allowed and should not be dismissed pursuant to Bankruptcy Rule 7012 or (b) the Debtors have served on the relevant claimant a Notice of Merits Hearing with respect to the Contested Claim.

³ As identified in the *Verified Statement of the Ad Hoc Group of Senior Noteholders Pursuant to Bankruptcy Rule 2019* [ECF No. 390].

6. The Debtors may file and serve a reply (a “**Reply**”) to a Response no later than 4:00 p.m., prevailing Eastern Time, on the day that is two (2) calendar days prior to the date of the applicable hearing (which may fall on a Saturday, Sunday, or legal holiday notwithstanding Bankruptcy Rule 9006 or equivalent provisions).

7. The Debtors, in their discretion, are authorized to adjourn a hearing scheduled in accordance herewith at any time by providing notice to the Court and the claimants.